Response Action Contract For Remedial Response, Enforcement Oversight, and Non-Time-Critical Removal Activities at Sites of Release or Threatened Release of Hazardous Substances in EPA Region VIII

U.S. EPA Contract No. EP-W-05-049

Field Oversight Report U.S. Moorings Substantial Product Investigation Gasco Sediments Site, Portland, Oregon

Work Assignment No.: 336-VOEE-10EW

Gasco/Siltronics

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Acronyms and Abbreviations

AOC Administrative Settlement Agreement and Order on Consent for Removal Action

BLRA Baseline Risk Assessment

bml below mudline

BNSF Burlington Northern Santa Fe
CDM Smith CDM Federal Programs Corporation
EE/CA Engineering Evaluation/Cost Estimate
EPA U.S. Environmental Protection Agency

FCR Field Change Request

ft feet

HASP health and safety plan

LOE line of evidence

NAPL non-aqueous phase liquid

PAH polycyclic aromatic hydrocarbon PCE probable effects concentrations

PID photoionization detector

PPE personal protective equipment

RAO removal action objective RI Remedial Investigation

RM river mile

RPM Remedial Project Manager

Site Gasco/Siltronic site SOW Statement of Work TZW transition zone water

U.S. Army Corps of Engineers
U.S. Moorings
U.S. Government Moorings site



Section 1

Introduction

Under Work Assignment 336-VOEE-10EW from U.S. Environmental Protection Agency (EPA), under EPA Region 8, Remedial Action Contract 2 No. EP-W-05-049, CDM Federal Programs Corporation (CDM Smith) was assigned to conduct oversight of field investigation activities at the U.S. Government Moorings site (U.S. Moorings) offshore area adjacent to the Gasco/Siltronic site (Site) located in Portland, Oregon.

CDM Smith provided technical field oversight of activities conducted by NW Natural in the U.S. Moorings offshore area as described in the *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan* (Anchor QEA 2013). CDM Smith also observed the processing of sediment cores collected by the U.S. Army Corps of Engineers (USACE) as part of a geotechnical and environmental investigation conducted around the U.S. Moorings dock in preparation for dock replacement. The objective of NW Natural's investigation and the environmental portion of the USACE's investigation was to identify the presence of substantial product as defined in Appendix A of the Gasco Sediments Site September 9, 2009 Administrative Settlement Agreement and Order on Consent for Removal Action (AOC; Docket No. CERCLA 10-2009-0255).

Sediment core sampling was conducted by Anchor QEA, LLC (Anchor QEA) on behalf of NW Natural from September 28 through September 29, 2013, and November 1, 2013. During this work, CDM Smith conducted oversight on the boat collecting the sediment cores to monitor health and safety compliance. CDM Smith also conducted oversight at the onshore processing area located on the Gasco site to provide an independent verification of the sediment characterization.

Sediment core sampling was conducted by Shannon & Wilson, Inc. (Shannon and Wilson) on behalf of USACE from September 29, 2013 through November 1, 2013. CDM Smith observed sediment core processing at the processing area located on the U.S. Moorings site to provide an independent verification of the sediment characterization.

This report summarizes the field oversight activities, field observations, photo documentation, and includes a discussion of deviations from the *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan.*

1.1 Project Background

The Gasco Sediments Site is located on the southwest bank of the lower Willamette River generally between river miles (RMs) 6 and 7, immediately downstream of the Burlington Northern Santa Fe (BNSF) railroad bridge. The U.S. Moorings offshore area is located downriver and adjacent to the Gasco Site. The Gasco and U.S. Moorings sites are located within Portland Harbor, which was designated a federal Superfund site by EPA in 2000 based on sediment contamination.

The Gasco Sediments Site 2009 AOC Statement of Work (SOW) identifies the process that is to be used to delineate the Gasco Sediment Sites interim project area. Section 3.6.2 of the SOW identifies nine



risk criteria that are to be used to delineate the interim project area. These nine risk criteria or lines of evidence (LOEs) include:

- 1. Substantial Presence of Product
- 2. Benthic Toxicity Bioassays
- 3. Benthic Toxicity Models
- 4. Human Health Shellfish Consumption
- 5. Human Health Direct Sediment Exposures
- 6. Sediment Probable Effects Concentrations (PECs)
- 7. Portland Harbor "Baseline" Polycyclic Aromatic Hydrocarbon (PAH) Levels
- 8. Groundwater Plume Concentrations (i.e., Transition Zone Water [TZW])
- 9. Other Potential LOEs (based on the Portland Harbor Baseline Risk Assessments)

In May 2012, NW Natural submitted a draft Engineering Evaluation/Cost Estimate (EE/CA) (Anchor QEA 2012) for the Gasco Sediments Cleanup Site to EPA for review. Consistent with the AOC, Removal Action Objectives (RAOs) presented in the EE/CA include a preference to remove "sediments containing substantial amounts of product that may serve as potential future source of risk material, unless it can be shown that the costs of such removal are clearly disproportionate to the degree of risk reduction to be attained through physical removal as compared to other remedial options for the same material." Section 2.5.3 of the EE/CA provides a summary of substantial product observations within the Gasco Sediments Site Area of Interest. The Gasco Sediments Site Area of Interest contains a portion of the U.S. Moorings offshore area including the U.S. Moorings dock. No substantial product was identified in the U.S. Moorings offshore area by NW Natural in the draft EE/CA.

The USACE was provided a copy of the draft EE/CA for review. The USACE submitted a letter dated August 14, 2012, to EPA (USACE 2012) in which USACE presented their own evaluation of substantial product in the U.S. Moorings offshore area using core data collected during the U.S. Moorings 2008 Remedial Investigation (RI) and 2008/2009 supplemental investigation and challenged the draft EE/CA conclusions. USACE identified nine core locations they believed met the definition of substantial product as defined in the Gasco 2009 AOC SOW.

Due to the critical nature of the substantial product LOE in defining the Gasco Sediments Site Project Area and evaluating removal action alternatives in the EE/CA, EPA directed their contractor, CDM Smith, to review core logs for sediment cores collected within the U.S. Moorings offshore area to determine whether substantial product was present consistent with the definition provided in Section 3.6.2.1 of the Gasco 2009 AOC SOW. A total of 24 core logs were reviewed to evaluate the presence of substantial product in the U.S. Moorings offshore area using the sediment descriptions provided on the logs.

Based on CDM Smith's review of the logs, three core locations were identified as potentially containing substantial product based on the sediment descriptions contained within the logs. Two other locations were identified as potentially containing substantial product based on the depth to which future maintenance dredging outside the navigation channel is anticipated to occur. The following



core locations were identified as potentially containing substantial product as a result of the review of the U.S. Moorings core logs:

- 50-BG
- GS-01
- SDDA-18
- 20-BF
- C528

EPA provided the evaluation to NW Natural (EPA 2012) and indicated that NW Natural could either accept the substantial product findings of the evaluation or re-sample the five identified sediment locations to verify the presence of substantial product. During a January 29, 2013 meeting between EPA, NW Natural, and Siltronic Corporation, NW Natural indicated they planned to pursue reinvestigation of the five core locations.

1.2 Substantial Product Definition

RAOs presented in Section 3.2 of the Gasco 2009 AOC SOW requires "removal of sediments containing substantial amounts of product (e.g., solid "tar" and/or NAPL [non-aqueous phase liquid]) that may serve as potential future source of risk material, unless it can be shown that the costs of such removal are clearly disproportionate to the degree of risk reduction to be attained through physical removal as compared to other remedial options for the same material."

The working definition of substantial product is provided in Section 3.6.2.1 of the Gasco 2009 AOC SOW. Direct text taken from the SOW regarding the definition of substantial product is provided below for reference:

3.6.2.1 Substantial Presence of Product

Areas with substantial presence of product in sediments is a line of evidence related to potential mobility of chemicals in the future, and thus related to risks identified in the BLRA [Draft Baseline Risk Assessment]. Visual observations in sediment cores shall be the primary parameter used for this line of evidence. As noted above, the term "substantial" product is intended to 1) target product that is related to potential future mobility and 2) indicate a preference for removal as defined by RAO #1. The definition of substantial product does not include every incidence of product observation at the site. Based on core observations, the working definition of "substantial presence of product" is those sediments that meet the following criteria:

- 1. Bands of product, layers of product, "saturated" sediments, "stained" sediments, and/or seams of product that are greater than 2 inches thick.
- 2. Any layer or seam of product, regardless of thickness, that is clearly defined as liquid NAPL that is also mobile (i.e., "oozes" or "drips" out of the core during core observations).

Modifying factors to this definition are:

3. If top 5 ft of core has no substantial product under Criteria #1, then deeper product should be judged as "not substantial", even if relatively thick layers of product exist at greater depths.



4. If there are any seams of mobile liquid NAPL (not solid or semisolid tar) per Criteria #2 then this is substantial product regardless of depth and the characteristics of overlying sediments.

The following is NOT substantial product:

- Any layers of non-mobile product (i.e., bands, layers, saturated sediments, stained sediments) that are less than 2 inches thick.
- Petroleum odors that are not associated with visual evidence of product beyond sheens and blebs.
- Sheens that are not associated with more substantial visuals of product.
- Isolated product blebs or spots not associated with more substantial visuals of product.

Criteria #3 shall consider whether the 5 feet of overlying relatively clean material includes any sediment that would be expected to be removed as part of Army Corps maintenance dredging in the navigation channel. If so, the 5 ft depth requirement should be judged from the depth to which maintenance dredging would occur. The edges of the area with "substantial presence of product" shall be defined by cores which do not contain substantial product.

1.3 Investigation Summary

1.3.1 NW Natural U.S. Moorings Substantial Product Investigation

A Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan was prepared by Anchor QEA (2013) on behalf of NW Natural to provide a work plan for the additional investigation in the U.S. Moorings offshore area. The objective of this investigation was to substantiate the presence of substantial product at the five core locations identified in EPA's November 2012 evaluation, as well as collect and archive sediment samples from select intervals for potential future chemical analyses.

CDM Smith personnel were present during the sediment core sampling and processing on behalf of EPA to provide oversight of health and safety and the technical aspects of the substantial product investigation.

A total of five sediment cores were collected by Anchor QEA on behalf of NW Natural from the five EPA-identified sediment core locations. Sediment core sample locations are shown on **Figure 1**. The cores were visually inspected for the presence of substantial product, and sediment from select intervals was archived for potential future chemical analyses. The five sediment cores were designated:

- 50-BG-AQ
- GS-01-AQ
- SDDA-18-AQ
- 20-BF-AQ
- C528-AQ



1.3.2 USACE U.S. Moorings Substantial Product Investigation

USACE notified EPA in August 2013 of their intent to conduct a geotechnical and environmental investigation around the existing U.S. Moorings dock in anticipation of demolishing the existing dock and constructing a new dock. USACE indicated they planned to collect eight environmental sediment cores for the express purpose of visually observing the cores for substantial product.

CDM Smith personnel were present on behalf of EPA during the processing of the environmental sediment cores to observe activities and visually inspect the cores to provide an independent verification of the presence of substantial product.

A total of eight sediment cores were collected by Shannon & Wilson on behalf of USACE at locations around the perimeter of the existing dock and footprint of proposed new dock. Sediment core sample locations are shown on **Figure 2**. The cores were visually inspected for the presence of substantial product. The eight sediment cores were designated:

- SD-101
- SD-102
- SD-103
- SD-104
- SD-106
- SD-107
- SD-108
- SD-109



Section 2

Objectives and Scope of Field Oversight

2.1 Governing Documents

Investigation activities completed by NW Natural at the U.S. Moorings site were conducted in accordance with the following documents:

- Anchor QEA, LLC. 2013. Memorandum from Mr. Ryan Barth and Ms. Joy Dunay to Mr. Sean Sheldrake, U.S. Environmental Protection Agency, re: Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan. July 18, 2013.
- Anchor QEA, LLC. 2010. Data Gaps QAPP/FSP (Appendix A to the Project Area Identification Report), Gasco Sediments Cleanup Action. Prepared for NW Natural. July 2010.
- U.S. Environmental Protection Agency. 2013a. Letter from Mr. Sean Sheldrake to Mr. Bob Wyatt, NW Natural, and Mr. Myron Burr, Siltronic Corporation, re: Review of Study Design for Sediment Characterization Adjacent to U.S. Moorings Site, Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan, Gasco Sediments Site. August 15, 2013.
 - This letter provided EPA's conditional approval of Anchor QEA's July 18, 2013 Study Design Memorandum for the U.S. Moorings investigation, which included some scope of work modifications.
- U.S. Environmental Protection Agency. 2013b. Letter from Mr. Sean Sheldrake to Mr. Bob Wyatt, NW Natural, and Mr. Myron Burr, Siltronic Corporation, re: EPA's Response to NW Natural's Response to EPA's Review of Study Design for Sediment Characterization Adjacent to U.S. Moorings Site, Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan, Gasco Sediments Site. September 9, 2013.

This letter provided additional clarification on the conditional approval granted by EPA in EPA's August 15, 2013 letter for the July 18, 2013 Study Design Memorandum.

Investigation activities completed by USACE at the U.S. Moorings site were conducted in accordance with the following document:

 Shannon & Wilson, Inc. 2013. Sediment Investigation Work Plan, Geotechnical and Sediment Investigation, U.S. Government Moorings, Portland, Oregon. Prepared for U.S. Army Corps of Engineers, Seattle District. October 11, 2013.

2.2 Objectives of Field Oversight

The main objectives of the field oversight were to 1) observe NW Natural field activities for compliance with the governing documents listed in Section 2.1, and 2) provide an independent verification of the presence of substantial product in sediment cores collected by NW Natural and USACE. All sediment cores collected from the U.S. Moorings offshore area during NW Natural's and



USACE's investigations were visually inspected by a representative from EPA, NW Natural, and USACE. CDM Smith's presence, as a representative of EPA, provided an independent evaluation from the assessments made by NW Natural and USACE.

Through daily reporting of field observations made by CDM Smith, the EPA Remedial Project Manager (RPM) was informed of the detailed status of the substantial product investigation work. Furthermore, oversight personnel provided the RPM with timely notification of issues that developed during the course of the investigation work, including possible deviations from the governing documents. This information was important because it assisted the RPM in making decisions regarding any necessary changes in the data collection effort.

2.3 Field Investigation Schedule

Sediment core sampling and processing was conducted by Anchor QEA on behalf of NW Natural from September 28 through September 29, 2013, and on November 1, 2013. Sediment core sampling and processing was conducted by Shannon & Wilson on behalf of USACE from September 29, 2013 through November 1, 2013. Both Anchor QEA (NW Natural) and Shannon & Wilson (USACE) utilized the same sediment coring subcontractor, Marine Sampling Services, for their respective investigations such that NW Natural's cores were collected first followed by USACE's cores.

2.4 Oversight Personnel

Oversight was conducted by the following CDM Smith personnel:

- Lance Peterson, Project Manager/field team support
- Jeanette Mullin, Field Team Lead sediment core processing
- Shawn Oliveira, Health and Safety Lead sediment core sampling/processing

2.5 Field Documentation

Information and notations were recorded as required in a field logbook in accordance with CDM Smith Technical Standard Operating Procedure 4-1, Revision 7 Field Logbook Content and Control. Field documentation consisted of an accounting of activities that occurred during the U.S. Moorings substantial product investigations, noting any problems or deviations from governing documents described in Section 2.1.

The field team lead maintained the field logbook and submitted it to the CDM Smith Project Manager for review, used it for preparing field reports, and filed it in the project files. Field notes are provided in **Appendix A**.

2.6 Photographic Documentation

Photographs were taken during field oversight in accordance with CDM Smith Technical Standard Operating Procedure 4-2, Revision 8 Photographic Documentation of Field Activities. Photodocumentation by the CDM Smith field oversight team included taking photos of field activities (especially where visual contamination was noted), field quality assurance/quality control



procedures, health and safety compliance procedures, and any other activities determined necessary. Photographs taken during field oversight are provided by date in **Appendix B**.



Section 3

Observations

3.1 Summary of Work Performed

On October 24, 2013, before mobilizing to the Gasco Sediments Site, a field-planning meeting was conducted by the CDM Smith Project Manager and attended by the CDM Smith field staff. During the meeting, CDM Smith field staff were provided information about the Site, health and safety issues, the objectives and scope of field activities, governing documents for the field work and required quality control measures, the roles and responsibilities of staff involved, equipment and training needs, communication requirements, and schedule. CDM Smith field staff obtained the required field supplies, including personal protective equipment (PPE), and reviewed health and safety plans (HASPs) to determine health and safety protocols for performing site work. The daily descriptions provided below present a general overview of activities performed during the substantial product investigation fieldwork with a focus on health and safety compliance, compliance with sampling and processing protocols, notation of field evidence of contamination (sheen, odors, elevated photoionization detector [PID] readings, discoloration) observed in the sediment cores, and whether the evidence of contamination met the criteria for substantial product.

3.1.1 NW Natural Sediment Core Collection and Processing

Sediment core collection and processing work initially occurred over a two-day period from October 28 through 29, 2013. However, a sediment core could not be collected at the planned GS-01 location by the core collection boat as the river water level was too low. NW Natural's consultant returned to the GS-01 location on Friday, November 1, 2013, during an extremely low tide when the location was dry to collect a sediment core using manual methods.

The following field teams were onsite to conduct and/or observe NW Natural's substantial product investigation in the U.S. Moorings offshore area:

- Anchor OEA Northwest Natural's consultant
- Marine Sampling Services Boat operation and sampling
- CDM Smith Field oversight on behalf of EPA
- USACE Observe core processing
- Shannon & Wilson USACE's consultant/observe core processing

CDM Smith's field team monitored the offshore core collection and onshore core processing conducted on October 28 through 29, 2013, and on November 1, 2013, to provide oversight of these efforts. Following is a summary of CDM Smith's observations.

October 28, 2013

In the early afternoon on October 28, 2013, the Anchor QEA sediment processing core crew conducted a kick-off meeting to discuss the scope of sediment core processing and logging, sample collection for archiving purposes, and health and safety issues – including exclusion zone protocols, potential trip



hazards, and hazards associated with saw cutting to open aluminum core barrels (noise hazard and flying debris). In addition to Anchor QEA and CDM Smith staff, the following USACE representatives were present at the sediment core processing area. A representative of USACE's consultant, Shannon & Wilson, was also present to observe core processing operations.

Four cores were collected on October 28, 2013 from the U.S. Moorings offshore area: 50-BG-AQ, SDDA-18-AQ, 20-BF-AQ, and C528-AQ (**Figure 1**). A sediment core was not able to be collected by the core collection boat at the GS-01 location due to low water conditions near the shore where the core location was situated. Anchor QEA notified EPA regarding the GS-01 core location situation.

Cores SDDA-18-AQ and C528-AQ were processed on October 28th at a core processing station set up adjacent to the Anchor QEA field trailer on the Gasco uplands. Core SDDA-18-AQ was processed starting at 1:00 pm, and Core C528-AQ was processed starting at 3:00 pm. Anchor archived sediment from each core from the following intervals: 0-1 feet, 1-4 feet, 4-8 feet, and 8-12 feet. Following are observations of field evidence of contamination observed within SDDA-18-AQ and C528-AQ and findings with respect to the presence of substantial product.

SDDA-18-AQ No substantial product identified.

Recovery: 89% from 0 to 12.3 feet below mudline (ft bml).

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

3.7 ft bml: Black band, 1-inch thick

4.5 – 4.7 ft bml: Black band that appeared to be approximately 2-inches thick.

Further investigation revealed the band to be separated into two bands by a very thin sediment layer. No sheen observed within band. A slight hydrocarbon odor noted in this interval. Organics such as wood fragments and roots were present in

the black band.

Anchor QEA collected a sample from the band(s) at 4.5 to 4.7 ft bml to archive for potential future laboratory analysis.

C528-AQ No substantial product identified.

Recovery: 75% from 0 to 9.3 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

5.8 ft bml: Black band, 1-inch thick, no sheen observed, slight

hydrocarbon odor

7.8 ft bml: Thin, discontinuous black seam (appears pebbly) less than 1

inch in thickness with no odor

October 29, 2013

At 8:35 am, the sediment core processing crew conducted a health and safety briefing prior to the start of core processing. USACE representatives were present at the site in addition to Anchor QEA and CDM Smith staff.

Cores 20-BF-AQ and 50-BG-AQ were processed on October 29th at the core processing station located on the Gasco uplands. The cores had been collected on October 28th and were kept chilled overnight. Core 20-BF-AQ was processed starting at 9:00 am, and Core 50-BG-AQ was processed starting at 10:30



am. Anchor QEA archived sediment from each core from the following intervals: 0-1 feet, 1-4 feet, 4-8 feet, 8-12 feet, and 12 feet to the core end depth. Following are observations of field evidence of contamination observed within 20-BF-AQ and 50-BG-AQ and findings with respect to the presence of substantial product.

20-BF-AQ No substantial product identified.

Recovery: 94% from 0 to 13.1 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

10.12 - 10.2 ft bml: Thin black band approximately 1 inch thick, no odor, no sheen
10.89 - 10.95 ft bml: Thin black band less than 1 inch thick, no odor, no sheen
11.7 - 11.8 ft bml: Thin black band approximately 1 inch thick, hydrocarbon

odor, no sheen

The 50-BG-AQ core location is situated on the upriver side of the U.S. Moorings dock adjacent to the Gasco uplands. This area of the river is not scheduled for maintenance dredging, unlike the SDDA-18-AQ, C528-AQ, and 20-BF-AQ core locations. As a result, the substantial product definition, as it relates to "bands of product' versus NAPL, indicates any 2-inch thick (or greater) product band observed within the sediment core must be located within the upper 5 feet to meet the substantial product definition. Any 2-inch thick product band observed below the upper 5 feet of sediment does not meet the substantial product definition. Product bands greater than 2-inches thick were observed in the 50-BG-AQ sediment core but all bands were located below the 5-foot threshold. The field evidence of contamination observed in 50-BG-AQ is noted below.

50-BG-AQ No substantial product identified.

Recovery: 99% from 0 to 13.9 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

5.7 – 5.95 ft bml: Dark black band approximately 3 inches thick, strong

hydrocarbon odor

7.7 – 7.95 ft bml: Dark black band approximately 3 inches thick, strong

hydrocarbon odor, slight sheen

8.25 – 8.4 ft bml: Wood waste layer containing visible sheen, hydrocarbon odor

8.85 – 9.05 ft bml: Dark black band approximately 2.4 inches thick, hydrocarbon

odor

10.15 – 10.35 ft bml: Dark black band approximately 2.4 inches thick, hydrocarbon

odor, slight sheen

12.9 – 13.05 ft bml: Black band approximately 1 inch thick

13.55 – 13.61 ft bml: Black band less than 1 inch thick

November 1, 2013

On October 31, 2013, Anchor QEA submitted a Field Change Request (FCR) Form to EPA to modify the collection method for the sediment core planned for the GS-01 location. The river water level had been too low on October 28, 2013 for the core collection boat to access the GS-01 location as originally planned. Anchor QEA proposed collecting a sediment core at this location using a hand-driven coring device during an extremely low tide to occur around 10:30 am to noon on November 1, 2013, in which it was anticipated the GS-01 location would be dry (i.e., above the water line). EPA approved the FCR.



The GS-01 location was observed to be dry at around 10:30 am on November 1, 2013. At 10:35 am, the core collection crew, CDM Smith, and representatives from USACE arrived at the GS-01 location. The former 2006 GS-01 core location had been marked by Anchor QEA previously for surveying purposes and the marker was still present (tubing and a water bottle anchored at the former boring location).

The core collection crew used a hand-driven coring device to attempt to collect a core near the GS-01 location. The target was the upper 2 feet of sediment as the original 2006 GS-01 log indicated "black staining 0 to 2.0 feet." The core collection crew intended to drive the core tube to a depth of 3 feet and then extract the tube containing the sediment core. The core collection crew made three separate attempts to collect a sediment core at the GS-01 location but they experienced difficulties due to large cobbles in the subsurface that deflected and deformed the polycarbonate core tube and difficulties associated with removing the tubes from the subsurface without losing the sediment core contained within as it was pulled up from the subsurface.

During the first coring attempt, the core collection crew removed approximately five inches of cobbles by hand from the surface of a small area near the GS-01 marker and then drove a 4-foot long polycarbonate core tube 3.5 ft into the subsurface. Prior to retrieval of the first core, the core collection crew attempted to collect a second core at a slightly different location. Another 4-foot long polycarbonate core tube was driven approximately one foot into the subsurface when refusal was encountered. Approximately 10 inches of sediment was measured within the second core tube. However, this material was lost during extraction and the end of the tube was damaged by an impact with a rock in the subsurface.

A third attempt was then made to collect a sediment core. The core collection crew removed some of the large cobbles (i.e., rip rap) on the surface and removed approximately six inches of reddish course-grained sand and rocks until the gray sediment beneath was uncovered. The core tube was driven three feet into the subsurface during the third attempt. Approximately 1.5 feet of material was measured in the core tube prior to removal. The core collection crew attempted to remove the core tube by excavating around it using a shovel. A dark gray silty sand was observed in the sidewall of the excavation. No black staining was observed along the sidewall, which reached a maximum depth of 2.5 ft bml. A slight sheen was observed on the surface of the water within the hole but no odor was noted. The core collection crew was unable to dig deeper due to sloughing and influx of water. The sediment contained within the core tube was lost during extraction, and the base of the tube was deformed by a rock impact and was not able to be re-used for another attempt.

Ultimately, the first core attempt was the only one in which sediment was able to be recovered. The core collection crew used a shovel to excavate around this core tube in order to remove it from the subsurface. Close observations were made of the excavation sidewalls around this core tube as it became clear that excavating to depth may be the only way to observe the upper 2 feet of interest based on the lack of recovery experienced with the second and third attempt core tubes (note: the second and third attempt core tubes were removed from the subsurface prior to removal of the core tube driven in the first attempt).

The excavation around the first attempt core reached a maximum measured depth of 2 feet 7 inches bml (which includes the 5 inches of cobbles removed prior to advancing the core tube) before the sidewalls began to slough due to the influx of water. No black staining was observed along the sidewalls and no odor was noted. A sheen was observed on the surface of the water within the hole. Some black mottling was observed in some of the sediment removed from the excavation, but these



were few and sporadic, and no odor was noted from these black pockets. The black coloring appeared to be related to organics.

The core tube was able to be removed from the subsurface and approximately 1.6 feet of sediment was recovered from the first attempt core. The core tube was transported to a core processing station set up adjacent to the Anchor QEA field trailer on the Gasco uplands. Sediment removed from the excavation around the core tube was placed on aluminum foil and then set into a bucket for transport to the core processing area for further inspection along with the sediment core.

Observations from the first core and the excavation around the first core were used to make decisions regarding the presence or lack thereof of substantial product at the GS-01 location. Observations are summarized below:

GS-01-AQ No substantial product identified.

Sediment Core Recovery: 1.6 feet

Maximum Excavation Sidewall Depth Observed: 2.6 ft bml

Field Evidence of Contamination Observed in Core or Sidewall:

No field evidence of substantial product observed. No black bands or layers observed. No odors noted in core or excavation. Slight sheen observed on water in excavation hole.

3.1.2 USACE Sediment Core Processing

Sediment core collection occurred over a two-day period from October 29 through 30, 2013, and sediment core processing work occurred over a three-day period from October 30, 2013 through November 1, 2013. The following field teams were onsite to conduct and/or observe USACE's substantial product investigation in the U.S. Moorings offshore area:

- Shannon & Wilson USACE's consultant
- Marine Sampling Services Boat operation and sampling
- EHS Inc. Shannon & Wilson's subcontractor/provide health and safety air monitoring
- CDM Smith Observe core processing on behalf of EPA
- USACE Observe core processing
- Anchor OEA –Observe core processing on behalf of NW Natural

CDM Smith's field team observed the onshore core processing conducted October 30 through November 1, 2013. USACE provided permission for CDM Smith to photo-document the sediment cores collected through their investigation during observations. Following is a summary of the CDM Smith field team's observations.

October 30, 2013

In the early morning on October 30, 2013, a health and safety briefing was presented by the U.S. Moorings facility Health and Safety Officer to discuss health and safety issues associated with the overall site. A project-specific health and safety briefing was conducted later adjacent to the core processing area by Shannon & Wilson. The core processing area was set up in a garage within a building on the U.S. Moorings upland area.



USACE informed the other field team representatives that five cores had been collected on Tuesday, October 29, 2013: SD-101, SD-102, SD-103, SD-106, and SD-109 (SD-109 was collected in lieu of core SD-105, as this location was inaccessible to the core collection boat due to low water conditions). Location SD-105 was located near the GS-01 position that Anchor QEA had been unable to reach on Monday, October 28, 2013 during their coring collection effort. Core SD-109 is reportedly located central to the inner dock area of the U.S. Moorings dock. Approximate sediment core sample locations are shown on **Figure 2**. USACE collected 14-foot cores at each of these locations.

Cores SD-101, SD-102, and SD-106 were processed on October 30th at the core processing station located within one of the U.S. Moorings buildings. Core SD-101 was processed starting at 9:40 am, Core SD-102 was processed starting at 1:05 pm, and Core SD-106 was processed starting at 3:10 pm. Following are observations of field evidence of contamination observed within SD-101, SD-102, and SD-106, and findings with respect to the presence of substantial product.

SD-101 No substantial product identified.

Recovery: 80% from 0 to 11.1 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

9.05 – 9.4 ft blm: Black layer/band approximately 4 inches thick.

Hydrocarbon/creosote-type odor. No sheen visible in core, no sheen generated during sheen test (i.e., place aliquot of soil in bowl of water). Woody debris noted in this layer. Shannon & Wilson logged the odor as hydrogen sulfide and faint wood

preservative.

Besides the black color and the odor (that field staff did not readily identify as product), no other evidence of product saturation was identified in the 9.05 to 9.4 ft bml layer in SD-101. The odor in woody debris present in the shoe of the core (at 11.1 ft bml) was much stronger and creosote-like, and was similar to the odor in the 9.05 to 9.4-foot interval black layer.

SD-102 No substantial product identified.

Recovery: 90% from 0 to 12.6 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

2.65 ft bml: Dark black thin band approximately 1/4 inch thick 7.1 – 7.4 ft bml: Black banding that is mottled and not continuous, wood

fragments noted throughout

7.8 – 8 ft bml: Slight dark banding/interbedded thin layers 8.2 – 8.8 ft bml: Layers of black mottling with wood fragments

9.2 – 10.25 ft bml: Black mottling with numerous wood fragments, hydrogen

sulfide odor

10.4 – 12.1 ft bml Black mottling with wood fragments, hydrogen

sulfide/creosote odor

The SD-106 core location is situated on the upriver side of the U.S. Moorings dock adjacent to the Gasco uplands. This area of the river is not scheduled for maintenance dredging. As a result, the substantial product definition, as it relates to "bands of product' versus NAPL, indicates any 2-inch thick (or greater) product band observed within the sediment core must be located within the upper 5



feet to meet the substantial product definition. Any 2-inch thick product band observed below the upper 5 feet of sediment does not meet the substantial product definition. Product bands greater than 2-inches thick were observed in the SD-106 sediment core but all bands were located below the 5-foot threshold. The field evidence of contamination observed in SD-106 is noted below.

SD-106 No substantial product identified.

Recovery: 100% from 0 to 14.1 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

5.0 - 5.2 ft bml: Black band approximately 2.4 inches thick, hydrocarbon odor,

sheen, wood fragments

9.0 – 9.25 ft bml: Black band approximately 3 inches thick, sheen

13.1 – 13.35 ft bml: Black band approximately 3 inches thick, slight hydrocarbon

odor

No substantial product was identified by CDM Smith in this core. Upon initial inspection, a dark black layer approximately 3-inches thick was observed from approximately 4.55 to 4.8 feet bml. CDM Smith's more detailed inspection of this layer identified a solid band from 4.58 to 4.71 ft bml (approximately 1.5 inches thick) but outside of these limits there were fine layers of dark brown sediment separating the "larger" layer into separate bands. The layer from 4.58 to 4.71 ft bml contained a hydrocarbon odor and sheen but was less than 2 inches thick.

October 31, 2013

In the early morning on October 31, 2013, Shannon & Wilson conducted a project-specific health and safety briefing adjacent to the core processing area. USACE informed the other field team representatives that three cores had been collected on Wednesday, October 30, 2013: SD-104, SD-107, and SD-108. USACE collected 14-foot cores at SD-104 and SD-107, and a 20-foot core at SD-108.

Cores SD-103, SD-109, SD-107, and SD-104 were processed on October 31st at the core processing station located within one of the U.S. Moorings buildings. Core SD-103 was processed starting at 8:15 am, Core SD-109 was processed starting at 9:40 am, Core SD-107 was processed starting at 11:55 am, and Core SD-104 was processed starting at 2:25 pm. Following are observations of field evidence of contamination observed within SD-103, SD-109, SD-107, and SD-104, and findings with respect to the presence of substantial product.

SD-103 No substantial product identified.

Recovery: 98% from 0 to 13.7 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

13.1 to 13.3 ft bml: Black band approximately 2.4 inches thick, hydrocarbon odor

but no sheen observed, no sheen produced from sheen test.

Layer did not appear to be saturated with product.

SD-109 No substantial product identified.

Recovery: 99% from 0 to 13.9 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)



8.9 – 9.05 ft bml: Black band approximately 1.9 to 2 inches thick, hydrocarbon

odor, no sheen, broken sheen (tiny specks) produced from a

sheen test

While the layer from 8.9 to 9.05 ft bml appeared saturated/ stained, no sheen was visible in the sediment layer and the hydrocarbon odor was not very strong. A broken sheen (tiny specks) was produced with a sheen test. No blobs or product were visible. The layer appeared to be exactly 2-inches and therefore did not meet the "greater than 2 inches thick" substantial product criteria even if maintenance dredging were to occur in this area such that the layer is within the upper 5 feet of the new dredge surface.

SD-107 No substantial product identified.

Recovery: 75% from 0 to 10.5 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

5.4 – 5.44 ft bml: Dark black thin band approximately 0.5 inch thick, slight

hydrocarbon odor, with organic debris

7.7 – 7.83 ft bml: Black band approximately 1.5 inches thick, slight

hydrocarbon odor, no sheen, no sheen produced with sheen

test

8.32 – 8.4 ft bml: Black band approximately 1 inch thick, hydrocarbon odor, no

sheen, not continuous through core, sheen specks observed

during sheen test

8.6 – 8.75 ft bml: Black band approximately 1.8 inches thick, wood material

present, slight creosote-like odor, cobble embedded in this

interval

9.0 – 9.1 ft bml: Black, medium-grained sand layer approximately 1 inch thick

containing wood fragments, visible sheen, creosote and

hydrocarbon-like odors, silt observed on one side of core tube

so layer is not continuous, broken sheen (sheen specks)

produced with sheen test but only on the sand and not the silt

9.36 – 9.42 ft bml: Black layer approximately 0.7 inch thick with sheen

USACE indicated Core SD-107 was re-located from its original planned position because Marine Sampling Services hit refusal during several attempts to collect the core at the proposed location. The position was moved approximately 5 feet further offshore (**Figure 2**).

SD-104 No substantial product identified.

Recovery: 86% from 0 to 11.98 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

1.25 – 1.28 ft bml: Dark black band approximately 0.4 inch thick, slight

hydrocarbon odor, no sheen, no sheen produced with sheen

test

1.65 – 1.7 ft bml: Dark black band approximately 0.5 inch thick, band thins

through core, slight hydrocarbon odor, no sheen, no sheen

produced with sheen test



2.13 – 2.23 ft bml: Dark black band approximately 0.1 inch thick, slight

hydrocarbon odor, no sheen, broken sheen (few specks)

produced with sheen test

November 1, 2013

In the early morning on November 1, 2013, Shannon & Wilson conducted a project-specific health and safety briefing adjacent to the core processing area. The last core collected by USACE, Core SD-108, was processed on November $1^{\rm st}$ at the core processing station located within one of the U.S. Moorings buildings. Core SD-108 was processed starting at 9:00 am. Following are observations of field evidence of contamination observed within SD-108 and findings with respect to the presence of substantial product.

SD-108 No substantial product identified.

Recovery: 72% from 0 to 14.3 ft bml.

Field Evidence of Contamination Observed in Core:

(noted field evidence does not meet definition of substantial product)

2.54 – 2.59 ft bml: Thin black band less than 0.5 inch thick, slight hydrocarbon

odor, no sheen, broken sheen (few specks) produced with

sheen test

3.13 – 3.15 ft bml: Thin black band less than 0.5 inch thick, very faint

hydrocarbon odor, no sheen

6.1 – 6.15 ft bml: Black band approximately 0.5 inch thick, no odor, no sheen,

no sheen produced with sheen test

7.23 – 7.33 ft bml: Black band approximately 1 inch thick, slight hydrocarbon

odor, no sheen, broken sheen (few specks) produced with

sheen test

3.1.3 Sediment Core Summary

Table 3-1 summarizes sample core recovery percentages, recovered lengths, and determination of the presence of substantial product for all sediment cores collected during NW Natural's and USACE's U.S. Moorings substantial product investigations.



Table 3-1. Sediment Core Details

Sediment Core Processing Details				
Sediment Core	Collected By	Percent Recovery	Total Length of Core to Process (feet)	Intervals that Appear to Meet Substantial Product Criteria
SDDA-18-AQ	Anchor QEA	89%	12.3	None
C528-AQ	Anchor QEA	75%	9.4	None
20-BF-AQ	Anchor QEA	94%	13.1	None
50-BG-AQ	Anchor QEA	99%	13.9	None
GS-01-AQ	Anchor QEA	53%	1.6	None
SD-101	USACE	80%	11.1	None
SD-102	USACE	90%	12.6	None
SD-106	USACE	100%	14.1	None
SD-103	USACE	98%	13.7	None
SD-109	USACE	99%	13.9	None
SD-107	USACE	75%	10.5	None
SD-104	USACE	86%	11.98	None
SD-108	USACE	72%	14.3	None

3.2 Health and Safety Program

Oversight of health and safety during implementation of the substantial product investigation by NW Natural in the U.S. Moorings offshore area was carried out by a CDM Smith employee who is a Certified Industrial Hygienist and Certified Safety Professional. Additional health and safety observations were made by CDM Smith field staff conducting oversight/observations during NW Natural's and USACE's investigations. This section provides a summary of health and safety observations.

During comprehensive health and safety assessments conducted by CDM Smith's Health and Safety Lead on October 28, 2013, field operations for the NW Natural substantial product investigation had some issues that were identified. After the issues were addressed, the work activities were found to be in compliance with the requirements as defined in the project HASPs and Federal Occupational Safety and Health Administration standards (see **Appendix C**).

3.2.1 Health and Safety Meetings

A detailed health and safety meeting was held at the Gasco site on October 28, 2013, before the start of NW Natural's investigation fieldwork (sediment core collection and processing). Anchor QEA held a second activity-specific health and safety meeting in the early afternoon of October 28, 2013 prior to the start of core processing at the core processing station situated on the Gasco uplands. Anchor QEA lead a health and safety briefing each morning prior to the start of fieldwork activities.

The U.S. Moorings facility Health and Safety Officer led a detailed general health and safety briefing on the morning of October 30, 2013 to discuss health and safety related to operating on the U.S. Moorings property. A detailed project-specific health and safety briefing was led by Shannon & Wilson on October 30, 2013 at the core processing station set up within a garage in one of the U.S. Moorings buildings. Shannon & Wilson led health and safety briefings each morning prior to the start of core processing activities.



3.2.2 Use of Personal Protective Equipment

In accordance with the Anchor QEA HASP, proper PPE for the NW Natural investigation fieldwork was modified Level D, requiring Tyvek (or rain gear made of heavy material with long sleeves and long pants), hard hat, safety glasses, nitrile gloves and heavy work gloves (when handling heavy drilling equipment), steel-toed boots, and hearing protection when needed. In addition, a personal floatation device was required to be worn at all times on or over water. Used PPE was properly disposed of within the exclusion zone as investigation derived waste. Overall, CDM Smith saw no substantive deficiencies in PPE use.

In accordance with the Shannon & Wilson HASP, proper PPE for the USACE investigation fieldwork was modified Level D, requiring hard hat, safety glasses, nitrile gloves and heavy work gloves (when handling sediment core tubes), chemically protective safety boots, and hearing protection when needed. The U.S. Moorings Health and Safety Officer made wearing a hard hat within the core processing station optional since the work was carried out indoors (i.e., within a garage) minimizing the potential for overhead hazards. The use of Tyvek was also optional depending on the type of work being completed and the potential for splashing of contaminated soil or water.

Air monitoring was conducted by EHS Inc., a subcontractor to Shannon & Wilson, during core processing activities. Air monitoring was conducted within the interior of the garage in which the core processing station was located. The garage bay door was left open as were several windows during core processing to allow adequate ventilation.

3.2.3 Slip, Trip, and Fall Hazards

No slip, trip or fall hazards occurred during field activities.

A health and safety incident occurred on October 31, 2013 at 2:40 pm when a Shannon & Wilson field team member cut his thumb with a box cutter that slipped while he was using it to open the end caps off Core SD-104. The U.S. Moorings facility Health and Safety Officer was notified and a report was to be completed and filed. The cut was taken care of with minimal first aid at the site (i.e., Band-Aid).

3.2.4 Weather Hazards

No significant weather hazards were present during the NW Natural and USACE investigations, primarily because the work was performed during decent weather at the end of October and early November 2013.



Section 4

Deviations

4.1 Summary of Deviations and Field Change Requests

On October 28, 2013, Anchor QEA attempted to obtain a sediment core at the GS-01 location as proposed in their *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan* (Anchor QEA 2013). However, the river water level was too low for the core collection boat to access this location near the shoreline during the investigation. Anchor QEA discussed the issue in the field with CDM Smith and by phone with EPA. Anchor QEA submitted a FCR to EPA for approval on October 31, 2013 to document a proposed deviation to the sediment core collection method for this core. Anchor QEA proposed collecting the sediment core at the GS-01 location using a hand-driven coring device while the location was dry during an extremely low tide to occur around noon on November 1, 2013. EPA approved the FCR and a copy is provided in **Appendix D**.

As described in the November 1, 2013 description in Section 3.1.1, Anchor QEA experienced difficulties obtaining a sediment core to the targeted depth of 3 feet bml at the GS-01 location using the hand-driven coring device due to the rocky substrate and due to difficulties recovering sediment within the core tubes during extraction. Anchor QEA discussed the situation with EPA by phone. As a result, Anchor QEA submitted a second FCR to EPA for approval on November 5, 2013 to document a revised sampling approach to allow visual observations during excavation of the core tube from the subsurface using a hand shovel and visual logging of material in the sidewalls to attain the targeted depth. EPA approved the FCR and a copy is provided in **Appendix D**.



Section 5 References

Anchor QEA, LLC. 2012. *Draft Engineering Evaluation/Cost Estimate, Gasco Sediments Cleanup Site.* Prepared for U.S. Environmental Protection Agency Region 10 on behalf of NW Natural. May 2012.

Anchor QEA, LLC. 2013. Memorandum from Mr. Ryan Barth and Ms. Joy Dunay to Mr. Sean Sheldrake, U.S. Environmental Protection Agency, re: Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Required by EPA – Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan. July 18, 2013.

Shannon & Wilson, Inc. 2013. *Sediment Investigation Work Plan, Geotechnical and Sediment Investigation, U.S. Government Moorings, Portland, Oregon.* Prepared for U.S. Army Corps of Engineers, Seattle District. October 11, 2013.

U.S. Army Corps of Engineers. 2012. Letter from Ms. Christine Budai, Planning Programs and Project Management Division, to Mr. Sean Sheldrake, U.S. Environmental Protection Agency Region 10, re: Summary of Substantial Product in Sediment Cores, U.S. Government Moorings. August 14, 2012.

U.S. Environmental Protection Agency. 2012. Letter from Mr. Sean Sheldrake to Mr. Bob Wyatt, NW Natural, and Mr. Tom McCue, Siltronic Corporation, re: Substantial Project Evaluation at U.S. Moorings Site, Gasco Sediments Site. November 29, 2012.

U.S. Environmental Protection Agency. 2013a. Letter from Mr. Sean Sheldrake to Mr. Bob Wyatt, NW Natural, and Mr. Myron Burr, Siltronic Corporation, re: Review of Study Design for Sediment Characterization Adjacent to U.S. Moorings Site, Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan, Gasco Sediments Site. August 15, 2013.

U.S. Environmental Protection Agency. 2013b. Letter from Mr. Sean Sheldrake to Mr. Bob Wyatt, NW Natural, and Mr. Myron Burr, Siltronic Corporation, re: EPA's Response to NW Natural's Response to EPA's Review of Study Design for Sediment Characterization Adjacent to U.S. Moorings Site, Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan, Gasco Sediments Site. September 9, 2013.

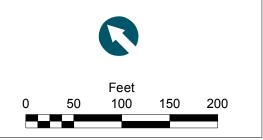


Figures





Core LocationNavigation Channel

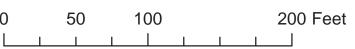




Proposed Sediment Core Location

Proposed New Dock Location





Date: 9/17/2013

U.S. Government Moorings

Figure 2

Appendix A **Field Notes**



CDM Smith



ENVIRONMENTAL FIELD BOOK

Nº 550F

Gasco Portland Harbor



ENVIRONMENTAL FIELD BOOK

Name _	CDM Smith	
	: 14432 SE Eastgate Way H 100, Belleve WA 98007 (425) 519-8300	
	Gasco	
_ Pro	Portland, or	

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154	Maximum Concentration of Contaminants for the Toxicity Characteristic
155	Conversions (Concentrations, Volume/Flow or Time, Velocity, Acceleration)
156	Conversions (Length, Weight, Volume, Temp, etc)

Location Gasco-PuHard Date 10/28/13 5 Project/Client Oversight of Substantial Project / Client Product Investigation 1042 - Jeanette Mullin ansite Joy Duray Anchor Dorg Lation Anchor Mete Setting up exactsion zone for core processing area. Purpose: Oversee conf processing Weather - Sinny clear ~ 43°F. Wind from the west. Joy indicated they have Collected first core and note working on second. Dan to long cores anshare for processive by annual 12:30 (m scheddle). 1140 Photo#1 - Core processing area prior to start of activities Photo #2 Another Newst Jum come processing area

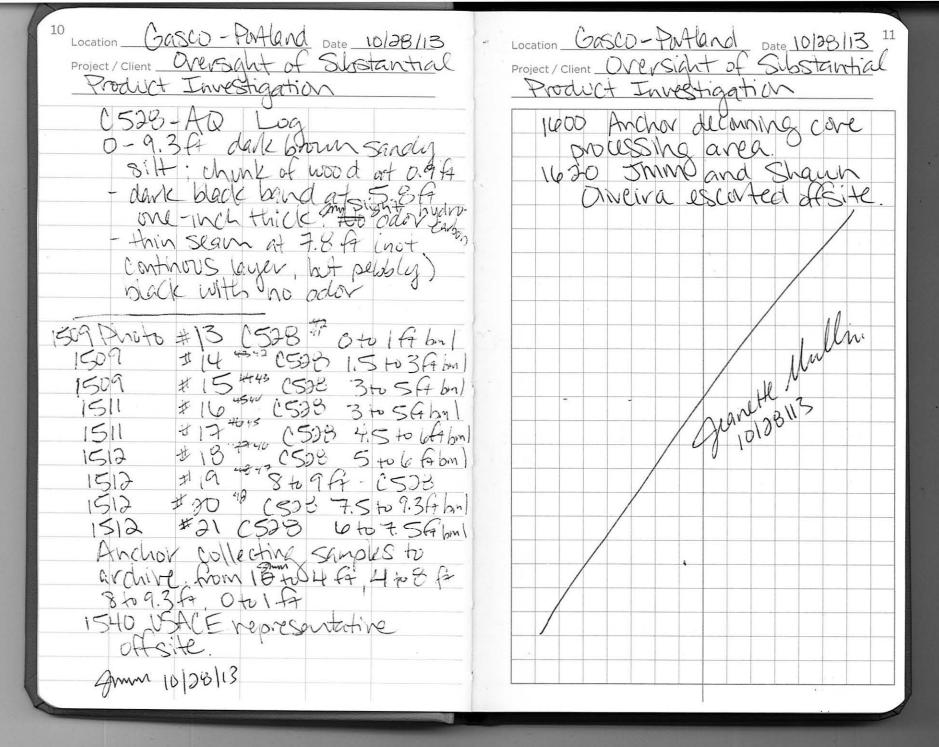
Location Gasco - Portand Date 10/28/13 Project/Client Oversight of Substantical Product Investigation 1141 DA Dhoto #3 Core processing prior to initiation of achinges 1230 SDA-18-AQ and C528-AQ cores are being transferred into core processing area SDA-18-AD Recovery 8996 Recovered to 12.1 About CSAB-AQ Reovery 75% Recovered to 9mg. 4 bml 1235 Health and Safety broking USACE ONSITE Property Chris Budai Paul Vandin-Mike Gross Sharon Gelinas Shawn Ofveira, CBM Ryan Barth, Ancher Amm 10128/13

Location Gasto-Parland Date 10/28/137 Project/Client Oversight of Substantial Product Investigation 1258 Begin cutting SDDA-18-AQ Jet noted one section dentified as (508. Anchor checked and then pulled connect section. 1329 Photo #4 SADA-18-AD 0 to 3 fg 1328 Photo #5 500A-18-AQ = 1399 Photo#6 5DDA: 19-AQ 1329 - Photo + 7 35 SDDA - 18AQ 1330 Photo# 8 50 DA-18-AQ 1331 Photo #9 500A-18-AD 1331 Photo \$10 3 9 to 10 G 1331 Photo # 11 11 11 to 12 PA 1331 Photo # 12 40 10 to 11 PA Jum 10(20113

Location GaSCO PAYLAND Date 10/28/13 Project/Client Oversight of Systantial Product Investigation SDA-18-AD - Log 0-3-4 for day & brown 5ity sand 3.4-3.7 sandy 5.14, darle brown black band at 3.74, lin thick 3.7-4.5A dark brann silty Save * 4.5 ft - H. left Black band separated by thin layer of higher 4.7 A - black band no sheer cond (4.5 A to 4.7 A Gingle Severaled --separated by very thin layer - organics (wood fragments or toots within layer) - 5.83 A to 5.89 Walk layer 7.8 St Sand content o increasing 8.56 OPOWly SWHED SAND dark brown, red. grained to 12.38 - Anchor grabbed simple from black grum 10/28/13

Project/Client Oversight of Substantial
Product Investigation

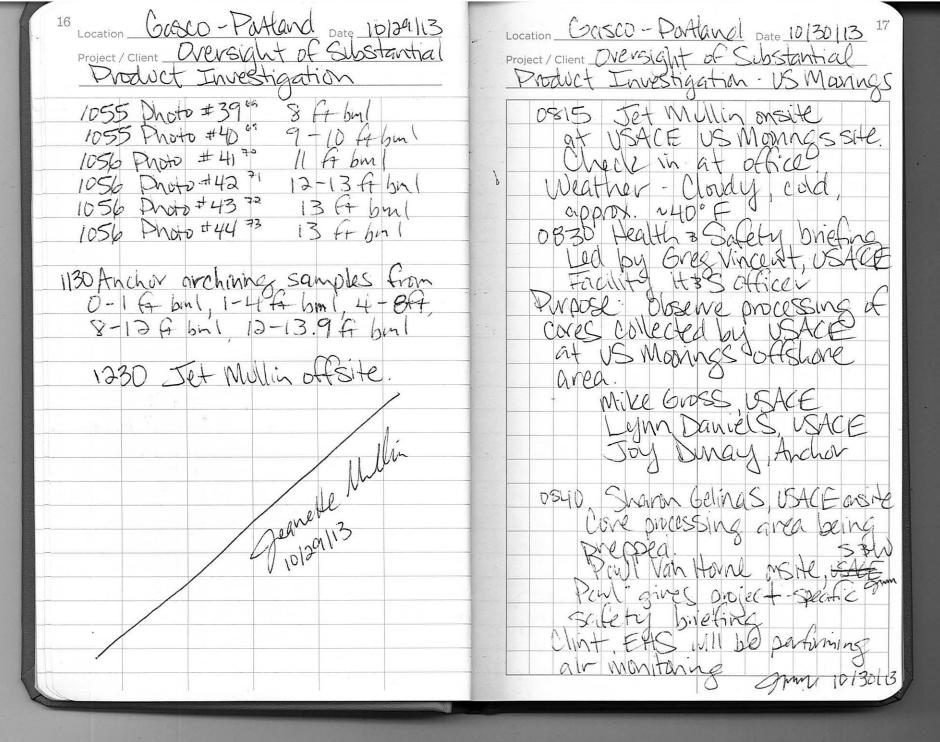
1405 Anchor archiving simples from 10-4 fa land, 408 fa land, 8-13-9 bon (from SDA-18-AQ and 5m0-1 fg bon (1433 Ryan Barth indicated that EPA has agreed that collection 65-01 will not occur due las water conditions making site maccessible to book Parly 4 coves will be collected for this event. Bill Jawarski Locat Contractor indicated the closest he could get to site 65-015 apportinately 50 feet away (halway between 50.86 and GS-bi All Bur cores have been collected. Boat is coming 500 Cove (578 cut upen grun 10/28/13



Location Gasco-Patanol Date 10129113 Project/Client DVersight & Substaintail Product Investigation 0815 Jet Mullin ansite. Inchor Staff prepping · Cure processing area. Charles Toy Sinay, Anchor 0830 USACE STAFF CASITE Mile Gross Sharon Gelinas Weather-Cliar, Sung, cold - Purpose: Review 20-BF-AD and 50-B6-AQ cores 0835 Health & Salety briefing 0840 20-BF-AQ 9650 receiver 0900 Core 20-BF-AQ opened. 20-BE-AD 13.187 0-13. If overle boun saving 10.1 fr thin mother back band approximately tinch, no oder 10, 9 ft this band of bick Somme 1012-113 , no sheen

Location Gasco-Parland Date 10/29/13 13 Project/Client Oversight of Substantical Product Investigation 10.77mm 11.7 to 11.8.4 - dark black bound approx. linch thick, hydrocarbin octor, no sheen 20 3 = AQ 0914 Photo # 220 0-1 Abml 0914 Photo # 23.51 1-24 bml 0915 Photo # 24 5 1-2 4 bul 0915 Photo # 255 2-34 bul 0915 Photo # 263 4-54 bin1 0915 Proto + 2755 5-6 A 6.nl 0915 Proto #2957 8-9766ml 0916 Proto # 30 50 9-1047 bin1 0916 Proto # 3159 11-12 Ft bin1 0916 Proto # 32 11-13 Ft bin1 09/16 Photo # 33 " photo of black band at 11.7 A bun1 Anchor archived sandes from 0-1 fr bm/ 1-4 ft bm/ 4-8- ft bm/ 8-12 ft bm/ and 12-13.1 ft bm/ 1000 Chris Budai, USACE ambes Jum 10/29/13 onsite

Location Gasco-Parland Date 10/29/13 15 Project/Client Oversight of Substantial Product Investigation 12.9-13.05 Black band LESS than 2 mches thick approximate Tinch 13.55-13.61 black band, less than luch thick to 13.9 dark brown sandy sitt except where black bands and noted. No sustainful mine identified as all layers over 2 inches thick are Ruted below 5 (4 bml and no dredging wann ea 50 - BG -AQ Photos 1055 Photo # 34 03 0-19bm USS Photo # 35.04 1-2 Ft bin 1055 Diroto # 36 65 3-4 FF bin 1055 Dhoto # 37 W 1055 Photo # 38 47 6-79 bm Smm 12129/13



Location Gasco - Partique Date 10/30/13 19 Location Gasco-Parand, Date 10130113 Project/Client Oversight of Substantia Project/Client Oversight of Substantial Product Investigation - US Maines Product Investigation - US Moonings 0944 Photo # 47 guling open Mile Gross Informed us that 5 cores have been Ching Bullai, USACE anside collected 1002 Photo # 48 + - new of gmm SS107 50106 core cuting process SDIDI SDIDZ 50101 length = 11.1 fz 50/03 and another core located in center of dock area to dark born sonoly replace proposed location SS105 (near Anchor's wood dubis a 6.65ff bint CS-DI location that they wood debis 3 7.75 bml were also mable to collect darker-black large & 8.34ft to 8.8 ft sml, wood churk due to low water 3 st in this larger, separated They collected IHA cores instead of 20 fa coves by deve brown interbedded Uners, laner a 8,83 to gra - Paul Van Horne, Shannon & Wilson 8.82 to somm 8.45 A
lauly has strong hydrigiba
butis less than 2 wiles = will be processing the cores 09452 Blyin to Cut open SDIOI Photo#45 74 Core processing Photo#4635 Cure processing dave layer a 9.05 to 9.4 approximately \$ 5mm 4 inches, strong Lyano-Carhin odbr no sheen w Amy 10/30/13 Jun 10/30/13

Location CaSCO-DAGNA Date 10/30/13 Location Gasco-Putland Date 10/30/13 21 Project/Client Oversignt of Substantial Project/Client Oversight of Substantice Product Investigation-US Maring Product Investigation - US Morings 1054 Photo # 49 80 0-1 A SDIOI 8.3 ft wood chunks contain 1054 Photo#50 81 1-24 SDIO1 crossoft - like odly 1054 Photo # 51 82 4-567 50101 8.8 fo - 3 inch wood chank 1055 Photo # 52 33 5-6450101 90-94 SOW STAFF indicate 1055 DNoto # 53 95 7-84 50101 this interval contains 1055 Photo #54 80 9-104 5010) 1055 Photo #55 87 10-11.145010 hydrogen subject oday ITTO GNES, faint wood preservative odlar 1570 fines organics layer a 9.05 to 9.4 fa bon 1 sand 1305 58W opening core - Wood dubis in shoe of core hes very strong creosofe-SDIOZ ev than hydrocarbon odor is 1.4 EHS-Inc. ran OM-PIS over core and noted Thin black Banding in Cayer no vocs from 9.7 to 11.1 of bm/ lecoren 12.6 ft bul with wood albis located throught Shot contents. 12.1 ft recovery (not counting shot contents) 0-12 le ft - dar lebram With strong creosule-type - Sharon Gelinas VSACE believes larger at 9.05 ft bin to 9.4 ft qualifies as substantial product sandy silt anding verification of dredge Jun 10/30 (13 gmm 10130113

Location GOSCO-PoAland Date 1013013 23 Location Gasco-Pintland Date 10/30(13 Project/Client DVCVSignt of Substantical Project / Client Drevsight of Sustantial Product Investigation US Mornings Product Investigation - US Moorings 1341 Dhoto #627 7 to 8 9 bnl Thin black band at 2.45ft ban 9. G bul 1341 Photo #63 95 approx 4 inch thick 1341 Photo #64 76 - Slight disvolvation, black 10 to 11 Abml 1341 Photo #65 97 11 to 12.1 4 by banding at 7.1 to 7.4 but is mothed and not continuous - wood fragments 510 Begin citing open Core SD-1060- recovered 3.5/23 + (+ bm + + + a) - Slight dave banding a 7.8 to Wifelt with shoe 8 / bml 0=13.1 fr bml - deve boun At 8.2 to 8.8 ft bird, black mothere with wood fragment! 13.5) sandy silt. - At 9.2 to 10.25 black motting with namenus - Thin Wall band from D. 4 to Wood fragments, suffice oder 1 inch thick, wood debus, At 10.420 12.1 black mothing wi wood fragment hydroca rom odor hydrogen sulide I cressote Mottled very this layers, carlow from 205 ft to 2.3 ft 60° 55-102 - Thin black bands, less than 1340 Proto #57 89 0-1 Abml 41 inch from 29 to 3.0 A - The black band at 3.65A - At 4 A bm, wood fragments Photo #58 1-2 A 6ml 91 3-4 Ff bul 340 Photo # 59 Photo#60 a2 4-5 Abul large wood chinks, bigte Photo #61 6-74 bn coloring Jun 10/30/13 Jun 10130113

Location Casco - Patland Date 10/30/13 25 Gasco-Putland Date 10/30/13 Project/Client WWGight of Substantial Project/Client Oversight of Sustaintal Product Investigation US Movings Product Investigation-US Mornings From 4 to 4.75 Abril Droduct. -8.47 to 8.50 Thin mother black bands with wood chunks black band and sheen -9 for to 9,25 black band - Black layer from 4,58 to 4.71 h bal Gust short of 2 inches), hydrocarbin sheen (2.4 inches thick) - Void at 9.7 to 10.5 odiv and sheen. USACK (note change for depth believes this is larger on following depth and there fore is measurements - need to Susstantial product
5ft to 5.2 ft contains celculate void to correct depth but has not been Shelin and wood fragments done in these notes as - reference tape in place) but is still brown in Calor 5.5A to 5.74 back Black band 10/ to 10,2band with hydrocarbon hydrocarbon odor, no shean odor, Sheen wood figurents -Black band at 11.2, 40 11.35 and organics, slightly over Lydwce bun dor sheen 2 inches in thickness duy have in larger to see if -6.5 to 7.1 black banding product would over in no interbedded with brown layers arounce observed - 7.48, to 7.6 black band Thin black band 12.7 to 1275 USS than 2 inches, saturated Thick black band at with product (visible on gloves 3. 1 to 13.35, aproximately 3. whethy but carbon oday (slight) James 10130113 with handling but is not book well Jun 10/30/13

Location Gasco-Parland Date 10/30/13

Project/Client Oversign + of Substantial Location Gasco-Portland Date 10 130113 27 Project/Client Oversight of Substantial Product Investigation - US Movings Product Investigation - US Mornings - Thin black band at 13.45 1715 Jet Millin offsite 1855 than 14 inch thick Scheduled to re-begin - Black band approximately 1-inch thick at 13.72 to care processing tomorrow 08:00 13.78 Core SN-106 1545 Photo #67 99 1-2 G brul 546 Photo # 68 100 2-3 A 6ml 546 Proto #69 3-4 f 6m 1544 Photo # 70 102 4-5 Abm/ 104 5-6 A bal 1546 Photo # 71 10/30/13 1547 Photo #72 105 7-8 Abril 1547 Photo #73 106 1547 Photo # 74 1547 Photo # 75 8-9 Abm1 104 9-10 Abm/ 109 10-11 A bml Photo #76 110 12-13 ft bin 1 Justo # 77 Photo # 78 548 Moto# 79 "2 Layer 2 4.584 bm) 1614 Photo #86 113 Layer 2 4.58 Photo#81 1614 A boul amm 10/20/13

Location Gasco-Putand Date, 10/31/13 Project/Client Oversight of Sustantial Product Investigation-US Movings gmm-28,0745 Jet Millin ansite. Paul Van Home Shannor & Wison Prepping care processing area. Safety briefing. Pupose: Continue to observe processing of USACE sediment Coves from US Moonings. Weather - Cloudy rain predicted, approx. 9510 F 0815 Paul Van Harne begins cuting open care SD-103 50-103 cove length = 13.969 by including shoe, but void at 11.6 to 41.85 50 actual recovery 13.70 fr bml Core 50-103 D-13.95, dark bysun sandy 5Ht with ranging amounts of sand intreasing a 11.8 gram 10/31/13

Location Gasco - Portland Date 10/3113 29 Project/Client Drevsight of Substantial Product Investigation - US Morings 7.93-8.02 - Thin band of medium sand 7. 56 - fragments of wood 8.05 - with chip (large) 8.28-8.32 - Black mothing but not a solid band 11.85-12.1 becomes darker no sheen faint pairocalor (not quite black), visheen 13.35-13.55 dark black band hydrocarbon odar no sheen produced with sheen test, no sheen 0851 Photo #82 "9 0-1 fr bm/ Photo #83 "5 1-2 fg bm Proto # 84 "4 Photo # 85 117 Photo # 86 19 6-7 4 bun 1 Photo # 87 19 7-8 4 bun 1 Photo # 88 10 8-9 1 bun 1 Photo #89 12 9-10 Abml Photo # 90 123 0853 11 G bil Photo # 91 173 12-13 fbm1 gmm 10/31/13

Location Gasco - Parland Date 10/31/13 Project/Client Oversight of Substantial Product Investigation - US Maxings 8.9-9.05 black layer hydrotor bon odus, no Sween, 2-inches thick broken sheen produced with sheen test, odar is not strong but not uable 9.36-9.47 black layer, decomposed wood fisers, hydrocarbon odor, layer is less than 2 -inches in thickness 9.65-10.65 alternating thin layers of black brown ayus o 11.53 - 11.6 wood fragments hydrogen sulfiche odar 12-12.03 Thin black band USS than 2 inches 12.1-12.18 thin black band USS than I inches 12.33-12.8 alternating mothed black layers of with sheen brocked with sheen test

Location Gasco-Parland Date 10/31/13 Gasco - Parland Date 1013111333 Project / Client Oversight of Substantial Project/Client Oversight of Sustantial Product Investigation - US Morings. Product Investigation - US Moorings 12,95-13.05 Black layer Dhoto # 96 129 3-4 fr bm1 Slight hydrocarbon odor, 4-5 A bin 1 no sheen, broken sheen Dhoto # 98 130 5-6 fr bml produced with sheen test DNOTO 409 131 16-7 6 binl 1019 Onsto # 100 132 7-8 fbm oftenating layers Photo #101 8-9 A hinl Photo #102 9-10 A binl Proto #103 10-11 for bon1 8,9-9.05 layer is exactly 2-inches and may quality as substantial product 11-12 A bml Photo # 104 1020 Proto # 105 12-13 A bml 13-13.9 A bml 1020 Photo # 106 sending diedge depth 13 View of 8.9 layer 1045 Photo #107 1046 Photo #108 140 determination. Layer Another view applars saturated but of black larger at 89-9.05 A hote that odor is not super strong. No sheen visible but looken shew 1155 Shannon & Wilson begins produced with sheen tot. cuting opening Core SD-107 No blebs visible. Paul Van House indicated that Cove 55-109 Photo #93 125 0-Bill Januarski hit vesistance Photo ttqu iso 0-16-6ml several times tripue to Photo #95127 2-3 [7 bml 1018 Collect this come and then mored it slightly from 0 planned location are to refuse Jun 10131113

Location Gasco-Parland Date 10131113 Location Gasco-Portland Date 10/31/13 Project/Client Oversight of Substantial Project/Client Drevsight of Subtantial Product Investigation - US Moonings Product Investigation - US Moorings 56-107 8.6-8.75 Wood waste 0-6.4 darkbrown sandy Cragments, slight creasofe like odor, coloble less than 2-inches in thickness 5.4-5.44 Black band less 9.0-9.1 Med Sand, black with than a-inches, slight word fagurents sheen, hydrocarbon odor contains creosofe like odor we and organic debis hydrocarbon oder, broken 6.4-7.38 Silly sand Streen produced with sheen of organics, notlets Fest day silt brom located on one side of core the, approx 07570 waganics layer does not senetate hydrogen sulide smell 9.36-942 Black layer, 7.53 Colar begins to 7.7-7.83 band at 7.7 to 7.83, Sheen, less than It inches in thickness 9.68-10.91 Mothed Cayers no sheen, slight hydrocalson odor, no of black and dark brown sheen would with no odov 10.2-10.5 organics mixed with sithy sand hydrogen 3.32-84 Wack band hydrocarbon. sufficle bolor odor, no sheen, less than grun 10/31/3 sheen test 10131113 amor

Project/Client Oversignst of Substantial
Product Threstigation - US Moonings SDIO7 Total core length 10.5 F of 14 Got core cincluding shoe contents) -No sustantial product identified 141 POI # 040 MQ FGG1 0-1 Fbul 1397 BNO40 #110 143 1-2 A bml 128 Photo # 112 2-3 F bm | 3-11 E 01011 111 # Otona 860) 1228 PNOTO # 113 145 4-C 4-11 1238 Proto #114 4-5 Abmi 123 PNOTO # 115 147 6-7 F 6ml 1229 Proto # 110 148 7-86 bml
1229 Proto # 117 149 8-9 Fr bml 1229 Proto # 118 150 9-10 Fabril 1229 Proto # 119 151 10-10.54 bal 1475 Shannon Bluison begins cutting open 50-104 thunb opening end cap on officer informed Firstaid

June 10/31/13

Location Gasco-Parand Date 10/31/13 37 Project/Client Oversight of Substantial Product Investigation-US Mornings administered. Wash and bandage minor cut. 50-104-Recovered length = 12.15 Abrilland 4.35-4.95 porly graded med-grain sand with interbedded pockets of davk brown sittem sandy 4.95-12.15 dark gray sand powly surel, med grain subangular to sitoromeliel 10.93 podlet of dark brown Isilt in sand 11.06 pocket of dark brown site 11.13 with sand matrix 11.25 podats of silt (small subble-like) in savel marm 11.55 pockets of silt in Sand matrix grun 10/3/1/3

Location Gasco-Parland Date 10/31/13 Location Gasco-Parland Date 10/3/1/3 39 Project/Client Oversight of Substantial Product Investigation - US Morning. Project/Client Oversight of Substantial Product Investigation - US Morings Dhoto #100 152 0-1 Fabra (Dhoto #101 153 1-2 Fabra SD 104 1.25-1.28 darkblack band Photo #122 154 2-3 ff 6m (
Photo #123 155 3-4 ff 6m (
Photo #124 156 4-5 ff 6m (Slight hydrocarbon odor 1510 USS than Dinches thick 510 165-17 derk back band Photo #125 157 5-67 6ml Photo #126 158 6-7 from 1510 Slight, hydrocarbon alor, USS than 2-inches, band 1511 6 - 7 A binl Dusto # 127 159 7-8 A bm (thing through core Proto # 128 160 8-9 A bon (2.13-2.23 dark black band, 1511 161 9-10 Abril 1511 stight hydrocalon oda Photo # 129 Photo #130 162 10-11 fbm (2.4-2,77 Sheen noted on 1511 Phóto #/31 dank brown sandy sitt 1511 163 11-12 A ban (164 12-12.15 Aba (faint hydrocarbon odor Photo # 132 55104 Core void from 10.45 to 10.82 (need to adjust No substantial product (ore recovery) identified in this core Shlen Test results - Scheduled to complete processing gran 3.15 Broken Sheen of last care tomorrow 2 0830 (Few specks) minor 1000 Jeanette Millin offsite 1.65 No sheen granette Millin 1.25 No sheen (1, speck) grun 10/31/13

Location Gasco-Parland Date 11/1/13 Location Gasco-Partand Date 11/11/3 41 Project/Client Oversight of Substantial Project/Client Drevsight of Substantial Product Investigation - US Mornings Product Investigation - US Movings 0800 Jet Millin onsite Weather Cloudy low 50s. Prose Overse processing Return Call From Lance of last core collected of by VSACE's contractor, 58W Deterson. Infilmed that EPA had approved Anchor's (NW Natural's) plan to (85D-108) collect a core at the GS-DI location. They are Paul Van Horne had already whiting for low tide which out 55-108 core prior to is outcipated around amival but had not opened 13:00 if yet 0810 Informed Mike Gross, USACE who had just amved of 50-108 59 % recivery additional core collection with a DD-Got core per Paul Van Harre as shown at GS-DI and Anchor's potential request to use in Stu log core processing area However actful recovery 0825 Joy Ovaly Ancher as noted from take measure onsite. Sharm Gelinas, USKE is 14.3 fa bon l'including also unsite. Joy indicated the shoe which is Anchor will set up their recovery our processing area so Shannon & Wilson can begin tear down mm 11/1/13 gm 111113

Location Casco - Partland Date 11/11/13 Location Gasco - Parland Date 11/11/3 43 Project/Client Oversight of Systantial Product Investigation US Movings Project/Client Oversight of Substantial Product Investigation - US Movings 51-10B 0-8.2 dark brown sandy Observed black layers 3.13 - 3.15 black larger to sheen 8.2-9.2 dark gran Sand very faint hydrocarlor odor with silt pockets, silt is USS then of truches thick 3.47-3.52 black mothing 9.2-12.2 dark gray sind interbedded leger 50f black and born, very faint party sorted, med - Fine grain, shounded hydrocarbon odor 12.2-12.7 dark bromosilt 4.25-4.43 Black mothing 12,7-12.gm 13.35 davk but not semasive balding gray sand (as above) 4.79-4.93 black mottling 3.35-13.57 med Sand w/ - banding but not solice brown organics throughout ager 13.57 ,14.3 dark gray sand no oder no sheen (as above) with pocket of dark brown silt 6.1-6.15 black band (no oder no sheen no Black ayers observed in 58-108 shew produced with sheen test 7.23-7.33 black layer 2.54-2.59 Blacklager, Slight slight hydrocaran odis hydrocarbon odor, do sheen boken sheen (few specks) no Sheen broken shee specks) produced with Anni broken sheen test, less than Shellen test

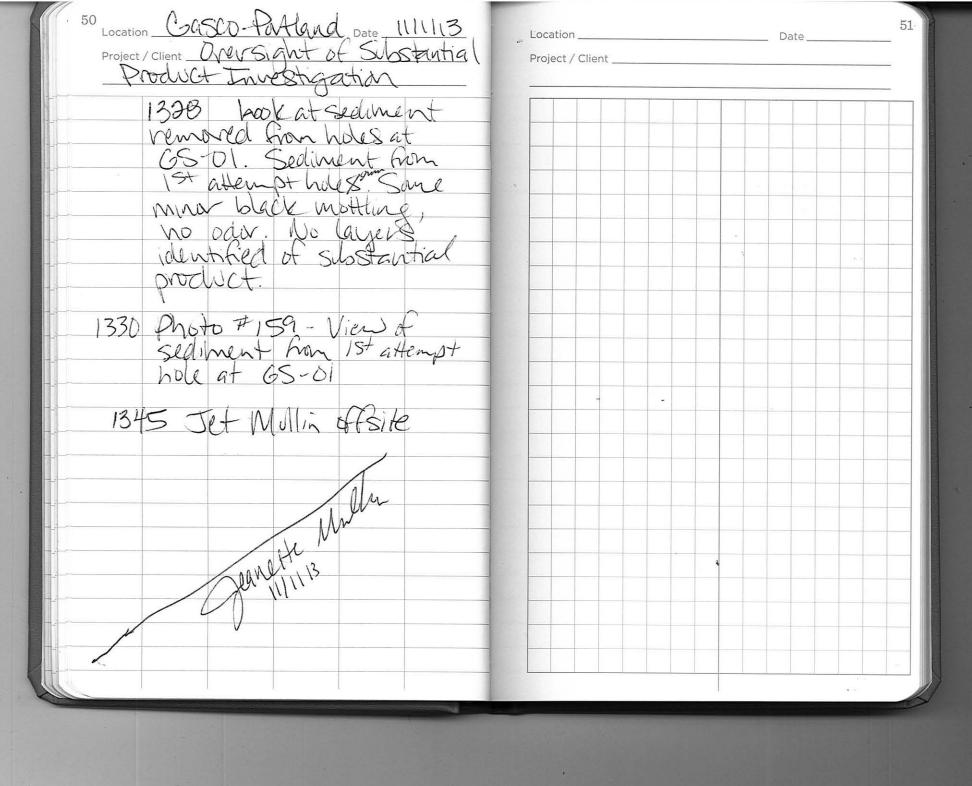
Location Gusco-Partando Date 11/1/13 Location Gasco - Parland Date 11/11/3 45 Project/Client Oversight of Substantial Project/Client Wevsight of Substantia Product Investigation - Us Marrys Product Investigation US Manings 5921 Photo # 144 178 11-12 6 bml 0921 Photo # 145 178 12-13 6-bml 0921 Photo # 146 178 13-14.3 6 bml 7.33-7.61 black mottling banding but not perasive 12.7 12.24 - 12.46 black 1005 Jet Mullin and Joy banding mottling but Sway Anche offsite US Mooning Facility. not penasive through layer 1015 Jet Willin and Joy Suas Anchor disité at Gasco Drose Ay serding Collection of core at No layers Identified that melt substantial product contena OS-01 location. 50-108 Photos 0919 Photo#133/150-19bm 1035 Amive a GS-01, location 0919 Photo # 134 " 1-2 from 1
0919 Photo # 135 " 2-3 from 1
0919 Photo # 136 " 3-4 from 1
0919 Photo # 136 " 4-5 from 1
0920 Photo # 136 " 5-6 from 1
0920 Photo # 139 " 6-7 from 1 Anchor had marked the GS-01 location in past (si sirveying purposes and marker was still in position 0900 Photo # 139 17 6-7 frbn/ 1027 Dhoto # 147 179 View of Anchor 0900 Photo # 147 9-9 6 bml
0900 Photo # 142 94 9-10 6 ml 0930 Photo # 141 173 core processing area 1027 Photo # 143 to Another were 0900 Dhoto # 143 175 10-11 fr bm) of Anchor care processing area Jan 11/11/3 gram 11/11/3

Location Gaso-Partand Date 11/11/3 Location Gasco-Porland Date 11/1/13 Project/Client Wevsight of Substantial
Product Investigation Project/Client Oversight of Sustantial Droduct Investigation 1041 Proto #149 181 View of upstream side of US Mannes 3rd attempt cove drive=36 in Bottom of the smeshed 1041 Photo#150 150 Another nost material while pilling out core. view of upstream side of US Movings dock. Dug with a shorel around core dung attempt to

place saily sand

no black staining identified 1057 Drive 42 inches, 4 foot care in first allemot 1105 Attempt 2nd 4-foot core at slightly different location. 10-inches of In wall of hole of in sediment removed have - aporximately 2 feet naterial in core Plastic core des Mash to dig and folded over tikely by rock deper are to motor of water and stoughing 6-inches to remove no-rap le inches & red oxidized rocks. Material lost from and core attempt Perse soud no-rack rows thelirwho by gray sily sand, sandisit interface. Dave 18-Inches of surface of water sediment in core . + 6 mohes gran 11/1/13 digging

Location GaSa - Parland Date 11/1/13 Project/Client_Oversight of Substantial Project/Client Aversight of Substantial
Product Investigation Product Investigation Anchor digging at 1st 1240 Ancher brought 1st care core. Observed Siderall back for newing at Gasco care processing area Hole is aff 2 in deep. Some sheen located on 1253 Anchor opening co the core 15t consattings led at 65-01 location SWELL. No odor, 1057 Dhoto # [SI " View of Anchor during 1st core Recovered #55 Peet 1108 Photo#152 180 2nd cove alternat photo 1142 Photo #153" View of 1250 Photo #157 0 to 1.6 Fbml 1258 Photo #158 " 1 to 1.6 Fbml hole filled with water with -0.6 -1.6 Fine-grained sand, gray sheen -1211 Photo # 154 "94 Remains 0-0, cobbus, vices, 1St core view of sidentill 214 Ponoto #155" Water with sebbles, red'oxidized Sand shen from removal of 1st core No discularation noted, 1224 Photo #156 196 New of US Mooning duck from Gasco no black staining in layers, no odor noted in recovered core - some black spoth givens noted in remarks seament but speractic and no oder am 11/1/13

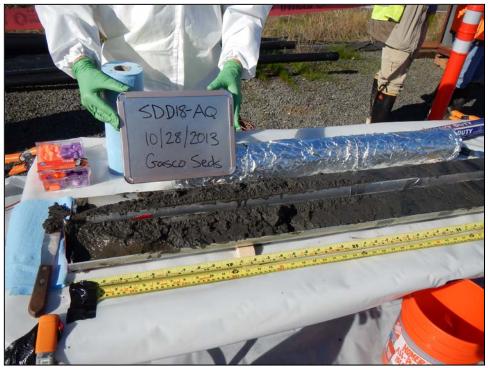


Appendix B Field Oversight Photographs





Core SDDA-18-AQ: 0 to 3 feet below mudline (bml)



Core SDDA-18-AQ: 0 to 3 feet bml





Core SDDA-18-AQ: 2 to 3 feet bml



Core SDDA-18-AQ: 4 to 5 feet bml





Core SDDA-18-AQ: 6 to 7 feet bml



Core SDDA-18-AQ: 8 to 9 feet bml





Core SDDA-18-AQ: 9 to 10 feet bml



Core SDDA-18-AQ: 10 to 11 feet bml



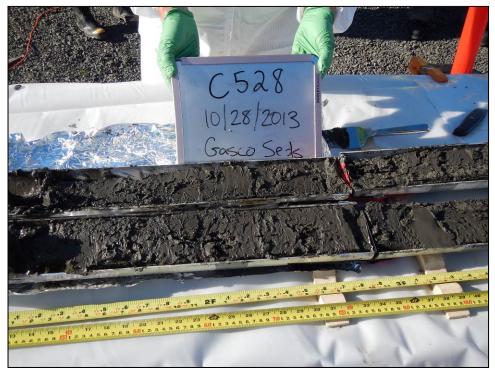


Core SDDA-18-AQ: 11 to 12 feet bml



Core C528-AQ: 0 to 1 foot bml





Core C528-AQ: 1.5 to 3 feet bml

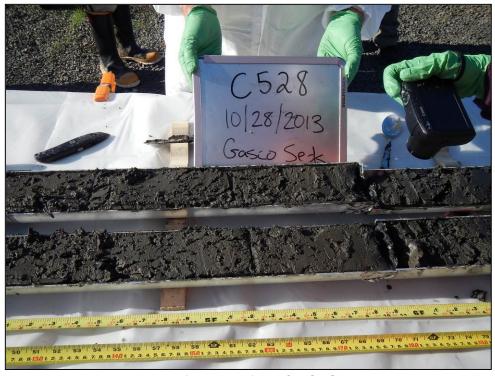


Core C528-AQ: 3 to 5 feet bml





Core C528-AQ: 3 to 5 feet bml



Core C528-AQ: 4.5 to 6 feet bml





Core C528-AQ: 5 to 6 feet bml

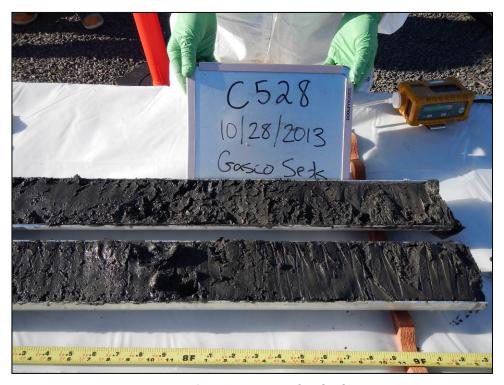


Core C528-AQ: 6 to 7.5 feet bml



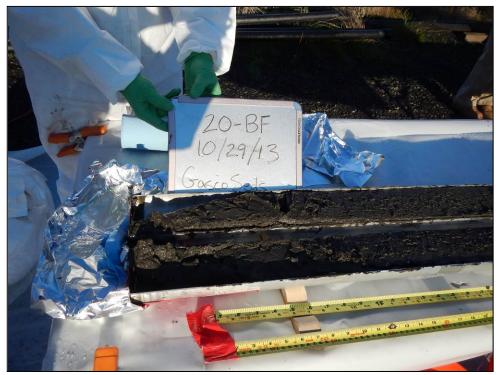


Core C528-AQ: 7.5 to 9.3 feet bml



Core C528-AQ: 8 to 9.3 feet bml





Core 20-BF-AQ: 0 to 1 foot bml



Core 20-BF-AQ: 1 to 2 feet bml



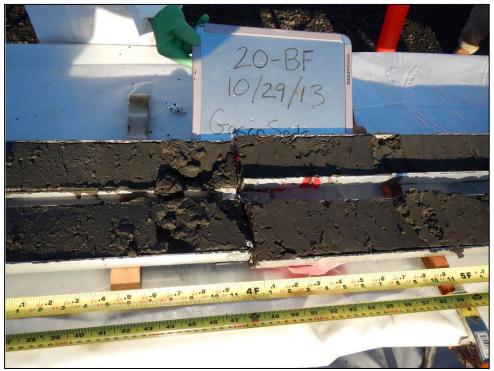


Core 20-BF-AQ: 1 to 2 feet bml

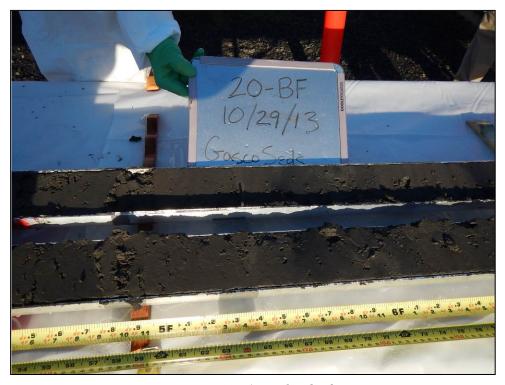


Core 20-BF-AQ: 2 to 3 feet bml



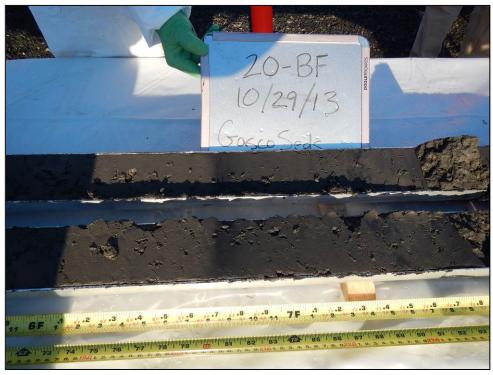


Core 20-BF-AQ: 4 to 5 feet bml

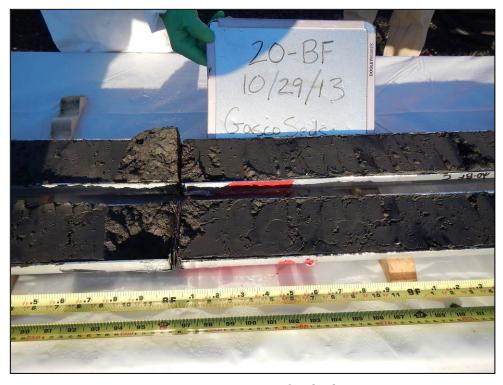


Core 20-BF-AQ: 5 to 6 feet bml





Core 20-BF-AQ: 6 to 7 feet bml



Core 20-BF-AQ: 8 to 9 feet bml





Core 20-BF-AQ: 9 to 10 feet bml

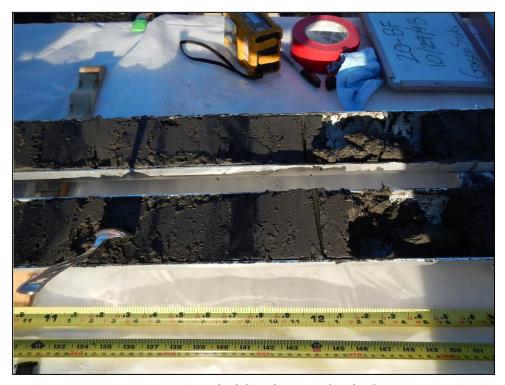


Core 20-BF-AQ: 11 to 12 feet bml



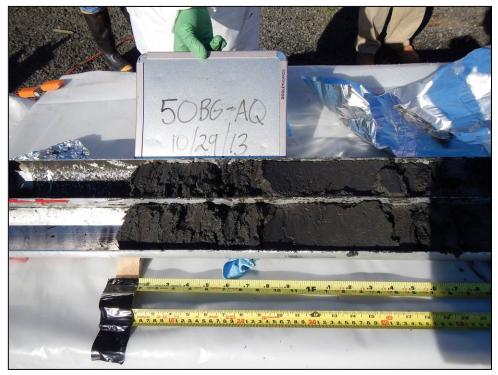


Core 20-BF-AQ: 12 to 13 feet bml

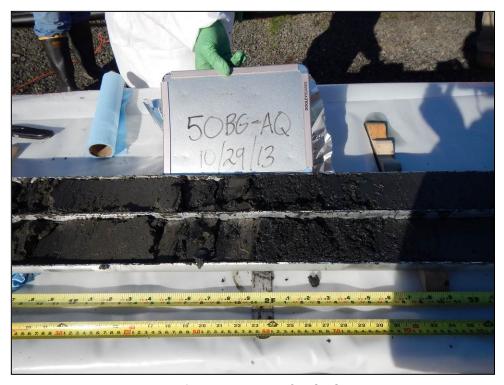


Core 20-BF-AQ: Black band at 11.7 feet bml



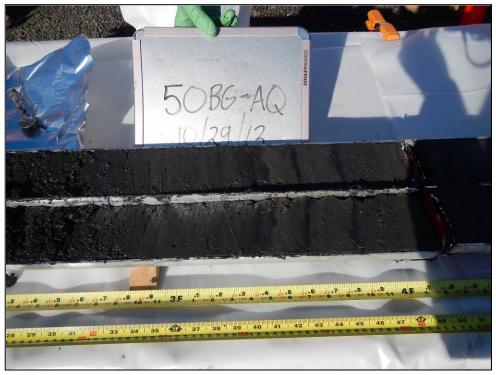


Core 50-BG-AQ: 0 to 1 foot bml



Core 50-BG-AQ: 1 to 2 feet bml





Core 50-BG-AQ: 3 to 4 feet bml



Core 50-BG-AQ: 5 feet bml



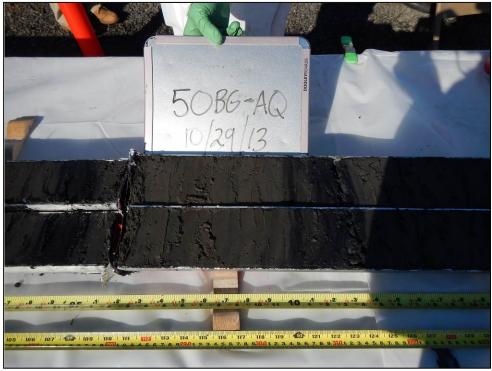


Core 50-BG-AQ: 6 to 7 feet bml

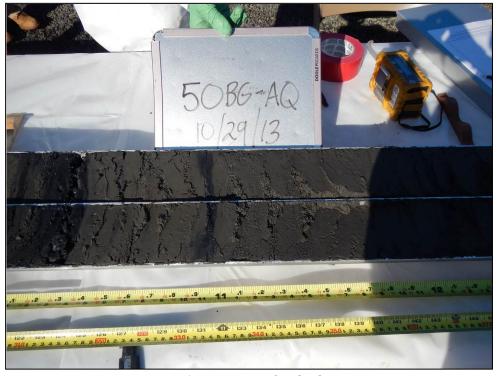


Core 50-BG-AQ: 8 feet bml



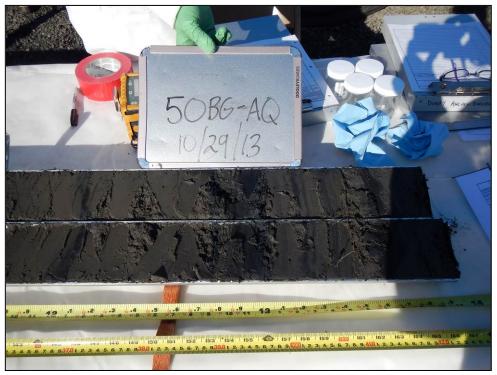


Core 50-BG-AQ: 9 to 10 feet bml



Core 50-BG-AQ: 11 feet bml



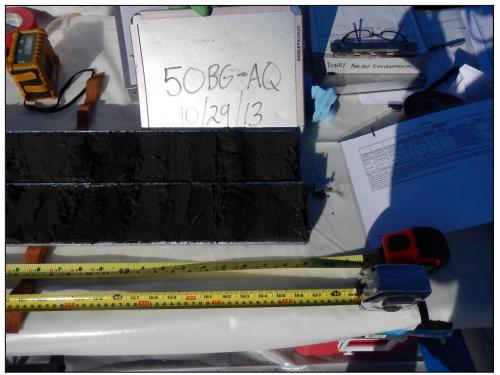


Core 50-BG-AQ: 12 to 13 feet bml



Core 50-BG-AQ: 13 feet bml





Core 50-BG-AQ: 13 feet bml





Core SD-101: 0 to 1 foot bml



Core SD-101: 1 to 2 feet bml





Core SD-101: 4 to 5 feet bml



Core SD-101: 5 to 6 feet bml





Core SD-101: 7 to 8 feet bml



Core 20-BF-AQ: 9 to 10 feet bml





Core SD-101: 10 to 11.1 feet bml



Core SD-101: Black layer at 9.05 to 9.4 feet bml





Core SD-102: 0 to 1 foot bml



Core SD-102: 1 to 2 feet bml





Core SD-102: 3 to 4 feet bml

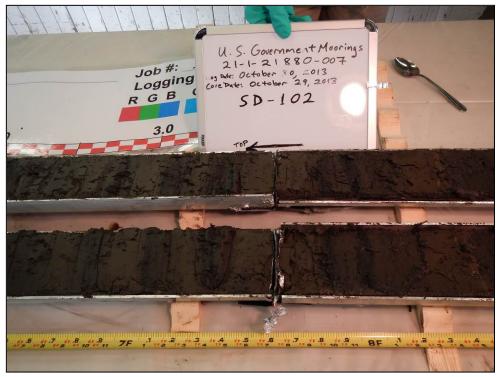


Core SD-102: 4 to 5 feet bml



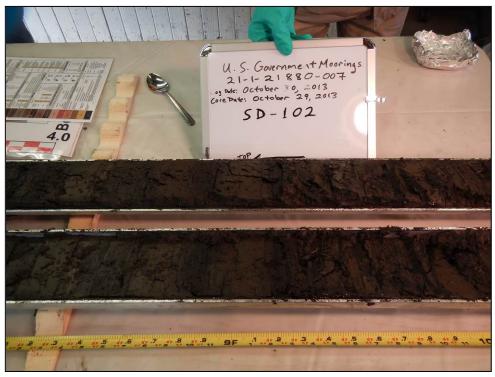


Core SD-102: 6 to 7 feet bml

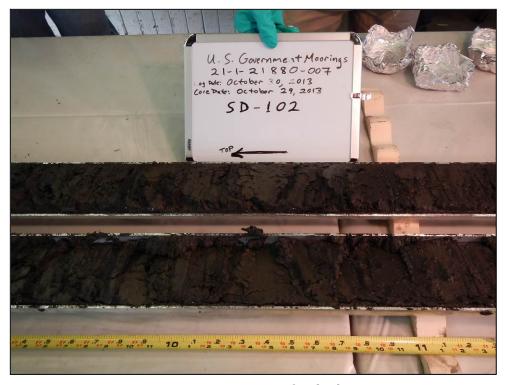


Core SD-102: 7 to 8 feet bml





Core SD-102: 9 feet bml



Core SD-102: 10 to 11 feet bml





Core SD-102: 11 to 12.1 feet bml

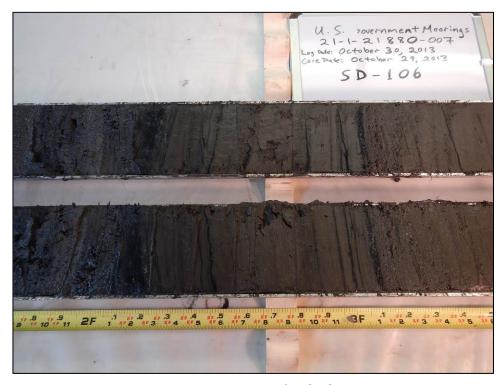


Core SD-106: 0 to 1 foot bml





Core SD-106: 1 to 2 feet bml



Core SD-106: 2 to 3 feet bml



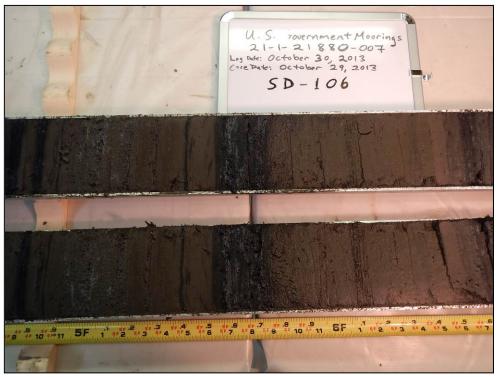


Core SD-106: 3 to 4 feet bml

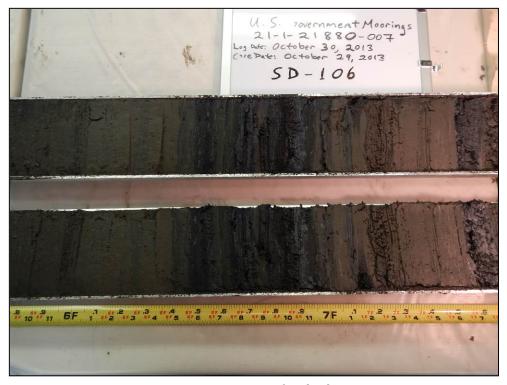


Core SD-106: 4 to 5 feet bml





Core SD-106: 5 to 6 feet bml



Core SD-106: 6 to 7 feet bml





Core SD-106: 7 to 8 feet bml



Core SD-106: 8 to 9 feet bml





Core SD-106: 9 to 10 feet bml

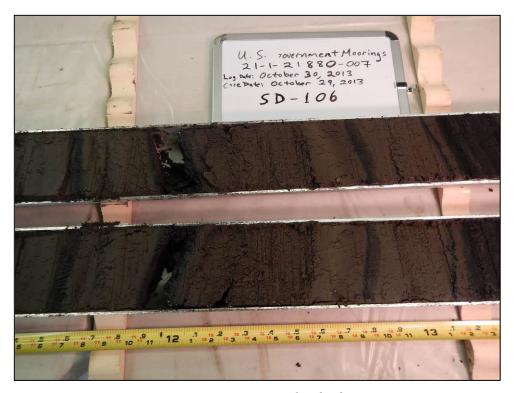


Core SD-106: 10 to 11 feet bml





Core SD-106: 11 to 12 feet bml



Core SD-106: 12 to 13 feet bml



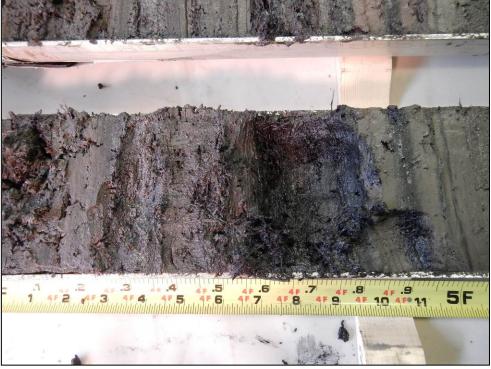


Core SD-106: 13 feet bml



Core SD-106: Black layer at 4.58 feet bml





Core SD-106: Black layer at 4.58 feet bml





Core SD-103: 0 to 1 foot bml



Core SD-103: 1 to 2 feet bml





Core SD-103: 3 to 4 feet bml



Core SD-103: 5 feet bml





Core SD-103: 6 to 7 feet bml

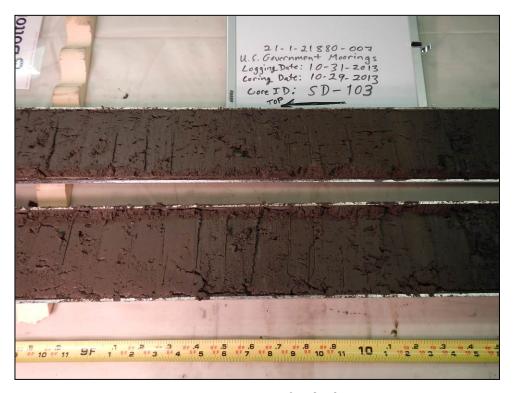


Core SD-103: 7 to 8 feet bml





Core SD-103: 8 to 9 feet bml



Core SD-103: 9 to 10 feet bml





Core SD-103: 11 feet bml



Core SD-103: 12 to 13 feet bml





Core SD-103: 13 to 13.9 feet bml



Core SD-109: 0 to 1 foot bml



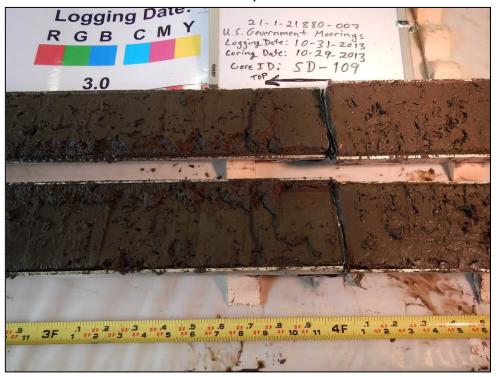


Core SD-109: 1 to 2 feet bml



Core SD-109: 2 to 3 feet bml





Core SD-109: 3 to 4 feet bml



Core SD-109: 4 to 5 feet bml





Core SD-109: 5 to 6 feet bml



Core SD-109: 6 to 7 foot bml





Core SD-109: 7 to 8 feet bml



Core SD-109: 8 to 9 feet bml





Core SD-109: 9 to 10 feet bml



Core SD-109: 10 to 11 feet bml





Core SD-109: 11 to 12 feet bml

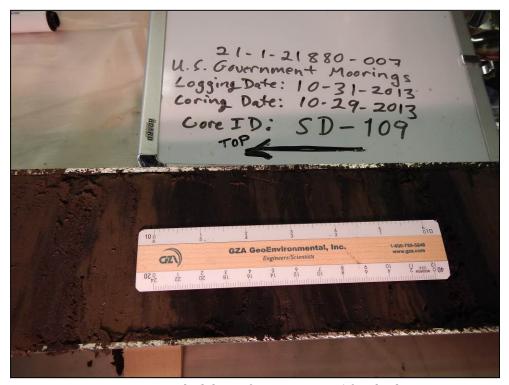


Core SD-109: 12 to 13 feet bml





Core SD-109: 13 to 13.9 feet bml



Core SD-109: Black layer from 8.9 to 9.05 feet bml





Core SD-109: Black layer from 8.9 to 9.05 feet bml



Core SD-107: 0 to 1 foot bml





Core SD-107: 1 to 2 feet bml



Core SD-107: 2 to 3 feet bml





Core SD-107: 3 to 4 feet bml



Core SD-107: 4 to 5 feet bml





Core SD-107: 5 to 6 feet bml



Core SD-107: 6 to 7 feet bml





Core SD-107: 7 to 8 feet bml



Core SD-107: 8 to 9 feet bml





Core SD-107: 9 to 10 feet bml



Core SD-107: 10 to 10.5 feet bml





Core SD-104: 0 to 1 foot bml



Core SD-104: 1 to 2 feet bml





Core SD-104: 2 to 3 feet bml



Core SD-104: 3 to 4 feet bml





Core SD-104: 4 to 5 feet bml

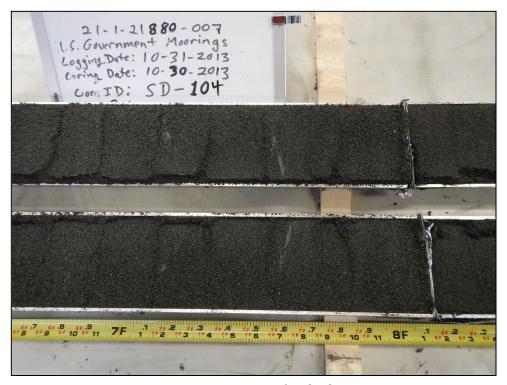


Core SD-104: 5 to 6 feet bml



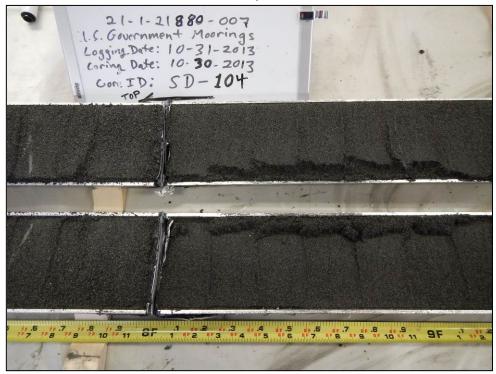


Core SD-104: 6 to 7 feet bml



Core SD-104: 7 to 8 feet bml





Core SD-104: 8 to 9 feet bml



Core SD-104: 9 to 10 feet bml





Core SD-104: 10 to 11 feet bml



Core SD-104: 11 to 12 feet bml





Core SD-104: 12 to 12.15 feet bml





Core SD-108: 0 to 1 foot bml



Core SD-108: 1 to 2 feet bml





Core SD-108: 2 to 3 feet bml



Core SD-108: 3 to 4 feet bml





Core SD-108: 4 to 5 feet bml



Core SD-108: 5 to 6 feet bml





Core SD-108: 6 to 7 feet bml



Core SD-108: 7 to 8 feet bml





Core SD-108: 8 to 9 feet bml



Core SD-108: 9 to 10 feet bml





Core SD-108: 10 to 11 feet bml



Core SD-108: 11 to 12 feet bml





Core SD-102: 12 to 13 feet bml



Core SD-108: 13 to 14.3 feet bml





GS-01 Location



GS-01 Location – Sheen on water in excavation hole (2^{nd} attempted core location)





Core GS-01-AQ Core Location and Excavation (1st attempted core)

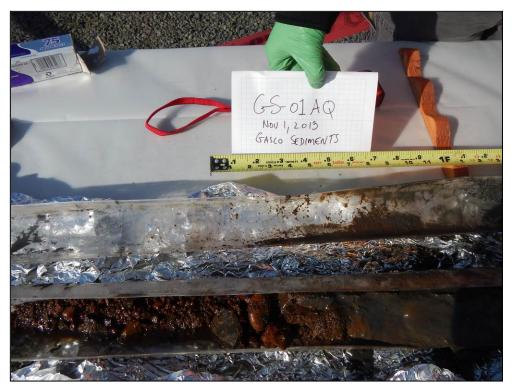


Core GS-01-AQ Core Location and Excavation (1st attempted core)





GS-01 Location – Sheen on water in excavation hole (1st attempted core location)



Core GS-01-AQ: 0 to 1 foot bml





Core GS-01-AQ: 1 to 1.6 feet bml



Core GS-01-AQ: Sediment removed during excavation to remove core from subsurface



Appendix C Health and Safety Inspection Reports



Health and Safety Summary

Recorded by: Shawn Oliveira, Certified Industrial Hygienist and Certified Safety Professional

10/28/13:

0800 hrs: CDM Smith and Anchor QEA personnel meet at the Gasco site for initial health and safety (H&S) kickoff meeting. Activities planned for October 28th included collection of 5 sediment cores adjacent to the U.S. Government Moorings (U.S. Moorings) property using a boat with Vibracore sampling technology and onshore core processing. Topics discussed include:

- Elements of Anchor QEA health and safety plan (HASP) (dated September 2010)
- Automated external defibrillator (AED) availability and operations
- Photoionization detector (PID) and Draeger tube monitoring of potential contaminants, including action levels and corresponding activities
- Routes of potential exposure, expected hazards, and control measures
- Personal protective equipment (PPE) required during offshore and onshore operations, including personal flotation devices (PFDs)
- Training certifications necessary for personnel
- Emergency response plans

0830 hrs: Arrive at Cathedral Park boat launch. Safety briefing held with Vibracore boat operators Marine Sampling Systems, Inc. (MSS) of Port Orchard, Washington (Bill Jaworski, vessel captain, and Dale Dickinson, deckhand). MSS personnel discuss vessel safety rules, emergency response, boat operations, and expected hazards/controls when on the vessel.

Following safety briefing, crew prepares equipment/vessel, launches, and proceeds to initial core sample location.

0923 hrs: CDM Smith H&S performs comprehensive safety inspection of ongoing project activities, and records no unsafe issues. Sampling and tasks are observed to be conducted in accordance with the Anchor QEA HASP and project safety procedures.

Approx. 1200 hrs: Crew returns to shore for lunch break and core processing following collection of two cores (SDDA-18-AQ and C528-AQ) using the Vibracore.

1300 hrs: Onshore core processing in progress. CDM Smith H&S performs comprehensive safety inspection of ongoing project activities, and records the following safety issues:

- Unable to determine whether the electric tools used in processing are running off of a ground fault circuit interrupter (GFCI) outlet. Markings were not present on the outlets and cords. Ryan Barth of Anchor QEA stated that GFCIs were inherent to the terminal wiring in use.
- A charged and inspected fire extinguisher was not in place initially during sample processing. Anchor QEA personnel immediately placed a suitable, charged extinguisher at the processing location.

- A gas can, and 3-20 liter cans of hexane were observed to be stored in a nearby Connex box (unrelated to oversight work). After bringing to the attention of Anchor QEA personnel, this was removed and placed in a separate flammable storage area.
- An aluminum core cutting tool (circular saw) appeared to have been locally modified.
 This was a tool constructed by MSS. The blade guard appeared to have been fixed in
 place, and unable to determine if this is consistent with the manufacturer's
 recommendations.

1419 hrs: Onshore core processing continues. CDM Smith H&S performs a comprehensive safety inspection of activities and records the following safety issue:

 Employee 40-hour HAZWOPER and 8-hour HAZWOPER Refresher certificates are not available onsite. It is noted that certain employees, such as the vessel deckhand, should require 40-hour training, but CDM Smith is unable to confirm this completion. Anchor QEA to provide these certificates and maintain onsite.

Overall Safety Summary

Based on a review of the Gasco/Moorings sample collection/processing performed by Anchor QEA and the vessel subcontractor, all program elements are in place to the degree required by the Occupational Safety and Health Administration (OSHA), applicable project HASPs, and accepted industry safety protocol as documented in the safety review inspections.

The following are select photos from the 10/28/2013 Gasco/Moorings sampling activities.

Photo 1: Setup of core processing location on the Gasco site upland.



Photo 2: Offshore sample collection and data recording on Vibracore vessel.

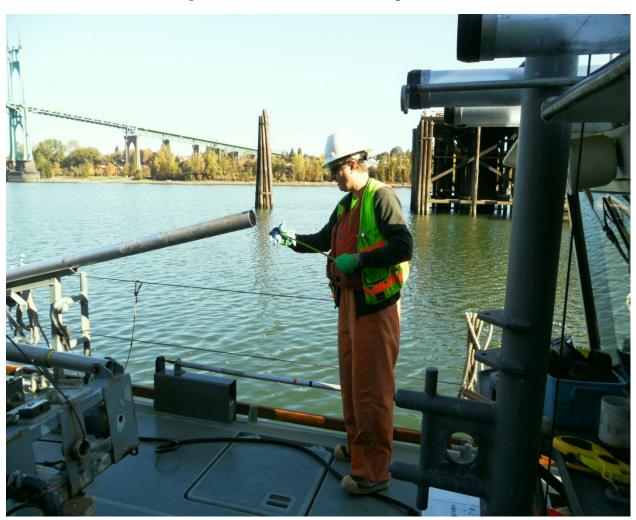


Photo 3: Preparing Vibracore equipment for sampling activities.



Photo 4: Crew logs sample information. Volatile organic compound (VOC) monitor in foreground.

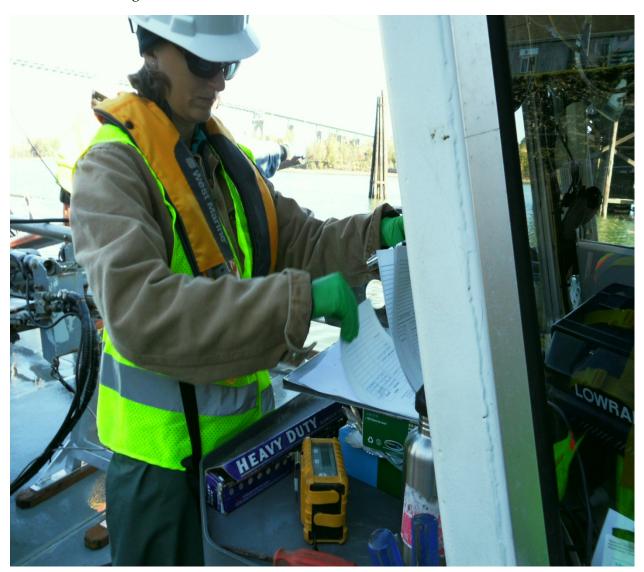


Photo 5 Anchor QEA personnel cutting sediment core tubes and processing core on the Gasco site upland.



SafetyNet Inspection Review

The SafetyNet system employs a user-friendly platform to quickly and efficiently record observations of field activities. Checklists are accessed on a smartphone or tablet device and are used by H&S personnel to evaluate work progress and compliance with the September 2010 Revised Final Anchor QEA Health and Safety Plan. Observations of activities are objectively treated as either safe or unsafe. Safe observations are uploaded to the server and tracked accordingly. Unsafe observations are treated as an open issue that must be corrected. Information related to the unsafe observation, such as the type and severity of the hazard, recommended corrective action, party responsible for implementing the corrective action, and the timeframe required to complete the corrective action, must be entered. Unsafe observations (i.e., open issues) remain open until a corrective action has been confirmed. The time duration of open issues is also tracked.

The SafetyNet inspections allow for a comprehensive assessment of all program elements required under the HASP.

The following tables provide a summary of the SafetyNet inspections performed by CDM Smith H&S at the Gasco/Moorings sampling locations on 10/28/13.

Inspection Type	Inspections	Observations	Unsafe Conditions	% Safe
Safety	3	168	5	97.00%

Gasco Moorings

Category	Sub-Category	Observations	Cond	% Safe	
Guidgely	out outegory	C D S C I VILIO II S	Unsafe Conditions	Safe Conditions	, ouic
Administration	Summary	25	0	25	100.00%
	Document pre-const mtgs	2	0	2	100.00%
	Emergency action plan	10	0	10	100.00%
	Freq/reg safety inspections	1	0	1	100.00%
	JHA/AHA submitted each trade	1	0	1	100.00%
	Safety manual	2	0	2	100.00%
	Safety meetings	3	0	3	100.00%
	State / Fed posters (Eng/Sp)	1	0	1	100.00%
	Visitor PPE available	2	0	2	100.00%
	Visitor sign-in form	3	0	3	100.00%
Drilling Operations	Summary	1	0	1	100.00%
	Containers labeled/stored	1	0	1	100.00%
Electrical	Summary	9	1	8	88.90%
	Cords in good condition	1	0	1	100.00%

Category	Sub-Category Observations	Observations	Cond	% Safe	
		Unsafe Conditions	Safe Conditions		
	Cords protected from traffic	1	0	1	100.00%
	Elect Hot Work Procedures	1	0	1	100.00%
	Electrical room protected	1	0	1	100.00%
	Energized parts protected	1	0	1	100.00%
	GFCI's used	2	1	1	50.00%
	Proper use temp pwr bxs	1	0	1	100.00%
	Signage present	1	0	1	100.00%
Environmental	Summary	18	0	18	100.00%
	Containers labeled	2	0	2	100.00%
	Dust Control Adequate	2	0	2	100.00%
	Haz material properly stored	2	0	2	100.00%
	Haz waste/RCRA requirements	10	0	10	100.00%
	Spill containment adequate	2	0	2	100.00%
Fire Protection	Summary	5	2	3	60.00%
	Ext charged and inspected	2	1	1	50.00%
	Fire suppression equip avail	1	0	1	100.00%

Category	Sub-Category Observations	Observations	Cond	itions	% Safe
			Unsafe Conditions	Safe Conditions	
	Proper fuel containers used	2	1	1	50.00%
Hand And Power Tools	Summary	16	1	15	93.80%
	Cord in good condition	2	0	2	100.00%
	Gauges working properly	4	0	4	100.00%
	Ground prong in place	1	0	1	100.00%
	Guards in place	2	0	2	100.00%
	Proper tool for the job	2	0	2	100.00%
	Strain relief functioning	1	0	1	100.00%
	Tool in good condition	4	1	3	75.00%
Hazard Communications	Summary	8	1	7	87.50%
	Copy of program	1	0	1	100.00%
	Employees trained	5	1	4	80.00%
	MSDS' (site specific)	1	0	1	100.00%
	Readily available	1	0	1	100.00%
Housekeeping	Summary	15	0	15	100.00%
	Clear access to bldg/site	2	0	2	100.00%
	Designated employee parking	2	0	2	100.00%
	Impalement protection	1	0	1	100.00%
	Proper material storage	2	0	2	100.00%
	Roadway around proj clear	2	0	2	100.00%
	Slip, trip, fall hazards	2	0	2	100.00%

Category	Sub-Category Observations	Observations	Conc	% Safe	
			Unsafe Conditions	Safe Conditions	
	Trash in protected cont	2	0	2	100.00%
	Walkways clear	2	0	2	100.00%
Medical / Emergency	Summary	16	0	16	100.00%
	1st Aid/CPR on site	2	0	2	100.00%
	1st aid kit	2	0	2	100.00%
	Emergency action plan	2	0	2	100.00%
	Emergency numbers posted	2	0	2	100.00%
	Emergency procs supplies	2	0	2	100.00%
	Eye wash	2	0	2	100.00%
	Map to medical facility	2	0	2	100.00%
	Team contact numbers	2	0	2	100.00%
P.P.E.	Summary	46	0	46	100.00%
	Glasses / face shields	7	0	7	100.00%
	Gloves	7	0	7	100.00%
	Hard Hats	7	0	7	100.00%
	Hearing protection	4	0	4	100.00%
	Metatarsal protection	7	0	7	100.00%
	Proper Clothing	7	0	7	100.00%
	Work Boots	7	0	7	100.00%
Site / Public Protection	Summary	9	0	9	100.00%
	Adequate break areas	4	0	4	100.00%
	Adequate lighting	1	0	1	100.00%
	Barricades installed properly	1	0	1	100.00%

Category	Sub-Category	Observations	Cond	% Safe	
		Unsafe Conditions	Safe Conditions		
	Company rep present	1	0	1	100.00%
	Perimeter fences	1	0	1	100.00%
	Public protection signage	1	0	1	100.00%

OSHA Recordables/Lost Time:10/28/13 = 0 OSHA Recordables/Lost Time To Date = 0

Appendix D Field Change Requests



Project Name:	Gasco Sediments Cleanup	o Action	Subconsu	ultant:	Anchor QEA	
Field Activity:	Sediment Core Collection	1	Request	Number:	1	
To: Sean Sh	eldrake, EPA		Date:	October	31, 2013	
Field Change Request (FC	R) Title: Rev	vised Core	Collection	n Method -	Insufficient Water Depth	
Description: NW Na	atural attempted to collect	t a single c	ore from	each of the	e five target stations identified	
in the EPA-approved Stud	ly Design for Sediment Cha	ıracterizati	ion Adjace	ent to U.S.	Moorings Site Required by EPA	
– Addendum 1 to the Proje	ect Area Identification Rep	ort Quality	/ Assurano	ce Plan, dat	ted July 18, 2013. The river	
water surface elevations v	were too shallow to facilita	ate core co	llection fr	om a vesse	el at station GS-01.	
Recommended Change:	NW Natural proposes	collection	of the co	re at statio	n GS-01 using a hand-driven	
core, accessed by personn	nel from the landside. The	core will e	either be a	a 2-inch or	3-inch decontaminated,	
Polycarbonate tube that is	s 3 to 4 feet in length, resp	ectively. 1	The diame	eter size wi	ll be selected based on the	
nature of the encountered	d materials. Anchor QEA p	roposes co	ollection a	at the targe	et location on Friday November	
1, 2013 between 12 and 1	pm during the low tide. C	DM Smith	and USAC	CE personn	el will be present during	
collection. Anchor QEA ar	nd CDM Smith personnel w	vill perforn	n the core	processing	g at an upland core processing	
area immediately followin	g core collection to visuall	ly evaluate	the prese	ence of sub	estantial product in the upper	
0 to 2 foot interval. USAC	E personnel will be provide	ed access t	to observe	e the core _l	processing activities per EPA's	
request.						
Joy Dunay		Joyeu	Dura	T	October 31, 2013	
Respondent Field Coordin	nator (or Designee)	Signatur			Date	
Approval:						
Ryan Barth		Ryan	n Bai	4	October 31, 2013	
Respondent Project Lead		Signature	<u></u>		Date	
		J				
Distribution List:						
Sean Sheldrake, EPA Sheldrake.Sean@epamail.e	<u>pa.gov</u> ; 206-553-1220		es Peale, M <u>e@maulfo</u>		503-501-5218	

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bhung@anchorqea.com; 503-688-5057

Alan Gladstone, Davis Rothwell Earle and Xochihua agladstone@davisrothwell.com; 503-222-4422

Project Name:	Gasco Sediments Clean	up Action Subconsu	ıltant:	Anchor QEA
Field Activity:	Sediment Core Collection	on Request I	Number:	2
То:	Sean Sheldrake, EPA	Date:	Novembe	er 5, 2013
Field Change Re	quest (FCR) Title:	evised Core Collection	n Method A	Amended Approach
Description:	As discussed in Field Change Re	equest Form #1 dated	October 3	1, 2013, NW Natural proposed
the collection of	a single hand-driven core at static	on GS-01 accessed from	m the land	side. Anchor QEA, CDM
Smith, and USAC	CE personnel accessed the station	from the landside on I	November	1, 2013. The subsurface
substrate prever	nted the collection of a core to the	target 3 feet below g	round surf	ace so Anchor QEA contacted
EPA to propose a	a revised sampling approach. EPA	agreed with the revise	ed approad	ch (described below) and
provided verbal	approval to proceed. The revised	approach achieved th	e visual ob	oservations to the target
depth.				
Recommended (Change: Station GS-01 contains	ined 10-inch cobble at	the groun	d surface so Anchor QEA
field personnel r	emoved the cobble to expose the	underlying sandy surf	ace. Anch	or QEA attempted to hand
drive a decontan	ninated 3-foot polycarbonate core	tube to 3 feet below	ground sui	rface (2 feet 2 inches
below sandy sur	face – accounts for removal of the	overlying 10-inch laye	er of cobbl	e). Several attempts were
made to reach th	nis target depth without success d	ue to rocky substrate	below the	sand layer. The deepest core
penetration was	3 feet 6 inches. Upon recovery of	the core, only 1 foot	8 inches of	f material was recovered.
Therefore, Anch	or QEA contacted EPA to describe	the recovery issue and	d propose	a revised sampling approach
that would allow	visual observations of the remain	ing 6 inches below the	e core reco	overy depth. This approach
included digging	using a hand shovel and visually le	ogging the mixed mate	erials in co	ordination with CDM Smith.
EPA approved th	is approach by telephone. Ancho	r QEA dug a hole to 3 f	feet below	the cobble surface and placed
materials in buck	kets. Anchor QEA and CDM Smith	logged the materials of	captured ir	n the core tube and visually
logged the mixed material in the buckets. No material was identified that achieved the definition of substantial				
product so this station was designated as containing no substantial product.				
		Joque Dura	1	
Joy Dunay			0	November 5, 2013
Respondent Fiel	d Coordinator (or Designee)	Signature		Date
Approval:				
		Run But	+	
Ryan Barth		Kyan Baut		November 5, 2013
Respondent Pro	ject Lead	Signature		 Date

Distribution List:

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